

EXHIBIT

11

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEW JERSEY

3
4 -----X

5 WILSHIRE BANK,

6 PLAINTIFF,

7 -against- Index No.:

8 02:14-CV-01770-JLL-JAC

9 MIYE CHON, a/k/a Karen Chon, SUK JOON RYU, a/k/a James S.
10 Ryu, HONG SIK HUR, TAE JONG KIM, BERGENFIELD BAGEL & CAFE
11 INC., d/b/a Cafe Clair, MAYWOOD BAGEL INC., UB'S PIZZA &
12 BAGEL INC., UB'S BAGEL & CAFE INC., and UBK BAGELS CORP.,
13 d/b/a Franklin Bagels & Cafe,

14 DEFENDANTS.

15 -----X

16
17 DEPOSITION OF KAREN CHON

18 NEWARK, NEW JERSEY

19 Thursday, June 23, 2016

20
21
22
23 Reported by:

24 JENNIFER DE LEON

25 Job No. 107961

Page 2

1 June 23, 2016
2 10:37 a.m.

3
4 Deposition of KAREN CHON, held
5 at 50 Walnut Street, Newark, New Jersey,
6 before Jennifer De Leon, Notary Public of the
7 State of New Jersey.
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Page 3

1 A P P E A R A N C E S:

2 LEE ANAV CHUNG WHITE & KIM

3 Attorneys for the Plaintiff WILSHIRE BANK

4 156 Fifth Avenue

5 New York, New York 10010

6 BY: MICHAEL YI, ESQ.

7 JANE CHUANG, ESQ.
8

9 MATTHEW JEON

10 Attorneys for the Defendants

11 MIYE CHON a/k/a KAREN CHON, TAE JONG KIM, BERGENFIELD

12 BAGEL & CAFE INC., d/b/A CAFE CLAIR, MAYWOOD BAGEL,

13 INC., UB's PIZZA & BAGEL, INC., and UB's BAGEL & CAFE, INC.

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16 BY: MATTHEW JEON, ESQ.
17

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19 Attorneys for the Defendant SUK JOON RYU a/k/a JAMES RYU

20 1880 John F. Kennedy Boulevard

21 Philadelphia, Pennsylvania 19103

22 BY: STEPHEN HARVEY, ESQ.

23 DAVID DZARA, ESQ.
24

25 ALSO PRESENT:

Marc Friedman and Christine

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1 M. CHON

2 THE VIDEOGRAPHER: We are now on the record.
3 Please note the microphones are sensitive to this and may
4 pick up whispering and private conversations. Please turn
5 off all cell phones or place them away from the
6 microphones, as they can interfere with deposition audio.
7 Recordings will continue until all parties agree to go off
8 the record.

9 My name is Marc Friedman representing Veritext
10 Legal Solutions. The date today is June 23rd, 2016 and the
11 time is approximately 10:37 a.m. This deposition is being
12 held at United States Federal Courthouse located at 50
13 Walnut Street, Newark, New Jersey, and is being taken by
14 the counsel of the plaintiff.

15 The caption in this case is Wilshire Bank
16 versus Miye Chon, et al. This case is filed in United
17 District Court District of New Jersey; case number
18 20:14-CV-01770-JLL-JAK. The name of the witness is Mia
19 Chon.

20 At this time, the attorneys in the room will
21 identify themselves, the parties they represent, starting
22 with the noticing attorney after which time our court
23 reporter, Jennifer de Leon, representing TSG Reporting will
24 swear in the witness and we can proceed.
25 Michael?

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1 M. CHON

2 MR. YI: Yes. Counsel for plaintiff Wilshire
3 Bank, my name is Michael Yi, and sitting to my left is my
4 colleague Jane Chuang, also counsel for the record for
5 plaintiff Wilshire Bank.

6 MR. JEON: Good morning. Matthew Jeon, Jeon,
7 Fort Lee on behalf of Ms. Chon.

8 MR. HARVEY: I'm Steve Harvey with my
9 colleague, David Dzara, for James Ryu who's here today but
10 not in the courtroom right now. He'll join us throughout
11 the day. I'm sitting up here in the bench, but just to be
12 clear, I'm not the judge. I'm not pretending to be the
13 judge. I'm clearly a lawyer in the case, but I'm just
14 sitting up here because it's convenient because of the way
15 the room is set up.

16 MR. JEON: I thought he was your law clerk.

17 MR. HARVEY: Again just for convenience.

18 C H R I S T I N E L E E, called as the
19 interpreter in this matter, was duly affirmed by a Notary
20 Public of New Jersey to accurately and faithfully translate
21 the questions propounded to the witness from English to
22 Korean and the answers given by the witness from Korean
23 into English.
24 * * *
25

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1 M. CHON
 2 MIYE CHON, called as a witness, having
 3 been first duly sworn by a Notary Public of the State of
 4 New Jersey, was examined and testified as follows:
 5 THE REPORTER:
 6 Q. Please state your name for the record.
 7 A. Karen Chon.
 8 Q. What is your address?
 9 A. 11 3rd Street, Englewood Cliffs, New Jersey
 10 07632.
 11 THE INTERPRETER: If I feel that you can
 12 understand, I'm just not going to -- I'm going to let you
 13 write down in English, you know what I mean?
 14 MR. YI: At this time I'd like to have Exhibit
 15 1 to this deposition marked by the court reporter. For the
 16 record, Exhibit 1 to this deposition is keep of notice for
 17 deposition, for this deposition, dated October 31, 2014.
 18 And for the record this deposition is taken by
 19 Wilshire Bank by me, pursuant to this notice of deposition.
 20 (Plaintiff's Exhibit 1, Notice was
 21 marked for identification, as of
 22 this date.)
 23 EXAMINATION BY
 24 MR. YI:
 25 Q. Ms. Chon, you indicated your legal name of

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1 M. CHON
 2 Miye Chon, are you also known as Karen Chon?
 3 A. Yes, at the bank.
 4 Q. Your legal name is Miye Chon, correct?
 5 A. (No verbal answer.)
 6 Q. Have you consumed anything such as alcohol
 7 beverages or medication that would affect your ability to
 8 testify at this deposition today?
 9 A. No.
 10 Q. Thank you. Do you understand that you're
 11 testifying under oath today and that you must answer each
 12 question truthfully?
 13 A. Yes.
 14 Q. Thank you.
 15 You've indicated your home address, are you --
 16 are you married?
 17 A. Yes.
 18 Q. What is your husband's name?
 19 THE WITNESS: T-A.
 20 Q. Is that Tae; last name Kim, K-I-M?
 21 A. Yes.
 22 Q. Do you have any children?
 23 A. Two children.
 24 Q. How old are they?
 25 THE WITNESS: Nine year-old and two and a

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1 M. CHON
 2 half.
 3 THE INTERPRETER: Two and a half -- can you
 4 see me.
 5 Q. Have you ever been deposed prior to today?
 6 A. No.
 7 Q. Have you ever testified before today at any
 8 legal proceeding?
 9 A. No.
 10 Q. Before I continue, just let me briefly tell
 11 you that, I'm going to be asking a series of questions.
 12 I'm going to ask you to listen to the question and try to
 13 answer as best as you can. If you don't understand any of
 14 my questions, I will ask you to indicate that and I will
 15 try to clarify if I can.
 16 If your attorney, Mr. Jeon, objects, that
 17 objection doesn't mean that you don't have to answer the
 18 question; you will still have to answer the question unless
 19 he tells you not to. Okay?
 20 A. Yes.
 21 Q. Okay. We're going to try to take a break
 22 about every hour give or take. But before we call for a
 23 break, if you need to take a break, please let us know.
 24 Okay?
 25 A. Yes. Okay.

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1 M. CHON
 2 Q. And I would ask you to do that after you've
 3 answered the question first.
 4 A. Yes.
 5 Q. Thank you. Have you ever been sued prior --
 6 asides from this case?
 7 A. Automobile accident, but I'm not sure whether
 8 that was a lawsuit. I'm not sure.
 9 Q. And is that matter still pending?
 10 A. No.
 11 Q. Have you ever sued anyone?
 12 A. No.
 13 Q. I am now going to ask you about your
 14 educational background. My understanding is that you
 15 emigrated to the United States at some point; is that
 16 correct?
 17 A. Yes.
 18 Q. What year was that?
 19 THE WITNESS: '91.
 20
 21 A. '91.
 22 Q. 1991?
 23 A. Yes.
 24 Q. And how old were you at that time?
 25 THE WITNESS: 11.

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1 M. CHON
2 A. 11.
3 Q. Did you attend public high school in New York
4 City?
5 THE WITNESS: Yes.
6 A. Yes.
7 Q. How many years?
8 THE WITNESS: Three years.
9 A. Two years.
10 THE WITNESS: Three years.
11 Q. And was that middle school?
12 THE WITNESS: High school.
13 A. High school.
14 Q. Are you referring to LaGuardia High School,
15 yes?
16 A. Yes.
17 Q. Did you graduate from that high school?
18 A. Yes.
19 Q. Did you attend any public school in New York
20 City before LaGuardia High School?
21 MR. JEON: Bryant High School.
22 A. Bryan High School.
23 THE WITNESS: Freshman year.
24 A. Freshman year.
25 THE WITNESS: And middle school.

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1 M. CHON
2 A. And middle school.
3 THE WITNESS: IS73.
4 A. IS73.
5 THE WITNESS: That's the middle school.
6 Q. Thank you. And did you attend college?
7 THE WITNESS: Just one semester.
8 A. Just one semester.
9 Q. And is that Fashion Institute of Technology?
10 THE WITNESS: Yes.
11 A. Yes.
12 Q. In Manhattan?
13 THE WITNESS: (Nodding.)
14 A. Yes.
15 Q. After your one semester at Fashion Institute
16 of Technology, did you work after that?
17 A. Yes.
18 Q. Where did you work?
19 THE WITNESS: Liberty Bank of New York.
20 A. Liberty Bank of New York.
21 Q. From when to when did you work there?
22 THE WITNESS: I started in 2001.
23 A. I started in 2001.
24 THE WITNESS: To one -- one -- one and a half.
25 A. One and a half. One and a half years.

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1 M. CHON
2 Q. And what was your position or title at Liberty
3 Bank of New York?
4 A. Teller.
5 Q. And where did you work after working at
6 Liberty Bank of New York for approximately one and a half
7 years?
8 THE WITNESS: I worked at -- I moved to Nara
9 Bank in Flushing.
10 A. I moved to Nara Bank in Flushing.
11 THE WITNESS: I worked there for six months.
12 A. I worked there for six months.
13 MR. JEON: I don't mean to object to my own
14 witness but I just want to tell Ms. Chon she's not
15 testifying in English, so you could speak Korean. Of
16 course, that's why she's getting paid all the money so just
17 stick to one language. Okay. If you don't need an
18 interpreter, we can stop and bring her back, but the record
19 has to be clear one way or the other. Okay.
20 So let's utilize her services. Sometimes I
21 know some questions are very simple, but maybe if you're
22 feeling more comfortable now, I don't know, but since we
23 have an interpreter, let's utilize her services.
24 THE WITNESS: Sorry.
25 MR. YI: That's okay.

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1 M. CHON
2 Q. Okay. Ms. Chon, what was your position at
3 Nara Bank in --
4 THE WITNESS: Teller.
5 Q. -- in Flushing, New York?
6 A. Teller.
7 Q. And where did you work after Nara Bank?
8 A. I took a little break and I went over to the
9 -- a Flushing bank of Liberty Bank of New York. I started
10 working there again as a teller.
11 Q. When you first began working at Liberty Bank
12 for New York in 2001, were you assigned to the Flushing
13 branch or Manhattan branch?
14 A. Manhattan branch.
15 Q. And how long did you work for Liberty Bank of
16 New York, the Flushing branch?
17 A. Until 2006.
18 Q. And where did you work after that?
19 A. After that I moved to New Jersey and I
20 start -- began working at Asiana Bank.
21 Q. Was that 2006 or 2007?
22 THE WITNESS: 2007.
23 A. 2007.
24 Q. And from when to when did you work at Asiana
25 Bank of America in New Jersey?

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M. CHON

A. I don't know when I began, but I worked until September. After that I worked at Bank of Asiana. (Whereupon, Mr. Ryu enters the room.)

Q. When did you begin working at Bank of Asiana?

A. September of 2007.

Q. Okay. Going back to Asiana Bank of America in New Jersey, what was your position or title there?

A. Customer service.

Q. And when you began working at Bank of Asiana, what was your title or position?

A. Teller and customer service.

Q. Okay. Let me try and see if I can clarify something. You testified, I believe, that you began working at Asiana Bank of America customer service from 2007, and I believe you indicated also, that you began working at Bank of Asiana as a teller and customer service in September of 2007. Is that correct?

A. Yes. Oh, a little after I joined the Asiana bank; I switched, I moved.

Q. Okay. So you started working at Bank Asiana in September of 2007. Where or which branch were you working starting in September of 2007?

A. Palisades Park branch.

Q. And is that branch located at 172 Main Street,

Page 15

M. CHON

Fort Lee, New Jersey?

A. That's Fort Lee. Palisades Park is 7 Broad Avenue.

Q. Thank you. And did you continue to work at that Palisades Park branch at Bank Asiana through October 2013?

A. No. I move to Fort Lee.

Q. Okay. You moved to Fort Lee branch; when was that?

A. I don't recall exactly.

Q. Was it from March 2010 to October 2013?

A. Around that, I think.

Q. When you were working at the Palisades Park branch Bank of Asiana, what was your title or position?

A. Just teller - customer service.

Q. And when you moved to the Fort Lee branch of Bank Asiana in or about March 2010, what was your position or title at that time?

A. The same. At first the same, the customer service.

Q. You were also working as a teller, correct?

A. Yes, teller.

Q. At some point during your employment with Bank of Asiana, was your title assistant vice president and

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M. CHON

operations officer?

A. Yes. I got promoted at first from customer service.

Q. Do you remember roughly when that was when you received the promotion to that title?

A. I don't.

Q. At some point during your employment with Bank Asiana at its Fort Lee branch, did you also become the head teller there?

A. No. From the beginning.

Q. Could you describe for us your duties and responsibilities as the head teller at the Fort Lee branch of Bank Asiana?

A. The practical task that I'm in charge of are managing the vault, the vault. We just don't do one thing. Including everything including customer care. I think I did everything.

Q. Is it fair to say that your duties and responsibilities included what's sort of customary of a bank teller?

A. Yes.

Q. And you indicated that you, I believe, you would -- you referred to a vault, are you referring to the branch's cash vault?

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M. CHON

A. Yes.

Q. Did you have -- as the head teller at that branch, did you have access to the cash vault of the branch?

A. All the tellers could.

Q. And is it your testimony that each teller of that branch had exclusive authority to enter or access the cash vault?

A. Yes.

Q. So is it fair -- is it your testimony that accessing the cash vault at that branch during that time period did not require more than one person?

MR. JEON: Objection as to form.

Q. I'm speaking in terms of authority when I say "more than one person."

A. Always two control. Two people.

Q. And so is it fair to say that you alone could not have accessed the cash vault at the branch during that time period?

A. Right.

Q. As the head teller of that branch during that time, did you also have access to Bank Asiana's computer system?

A. Yes.

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M. CHON

Q. And Bank Asiana assigned to you as the head teller username and password?

A. Yes.

Q. And you had exclusive -- only you were assigned to that particular username and password, correct?

A. Yes.

Q. Was Bank Asiana's computer system at that branch during that time period referred to as Jack Henry?

A. Yes.

MR. YI: At this time I am going to ask that this document be marked as Exhibit 2 to this deposition. It's a copy of the superseding indictment.

THE REPORTER: It's a copy of, what?

MR. YI: "The superseding indictment."

THE REPORTER: Oh, thank you.

(Plaintiff's Exhibit 2, Superseding Indictment was marked for identification as of this date.)

Q. Ms. Chon, I'm showing you what's been marked as Exhibit 2 to your deposition. Is this a copy of the superseding indictment that was filed in the criminal case, United States of America versus Miye Chon a/k/a Karen Chon, which was filed by the U.S. Attorney's office in that criminal case on November 23, 2015?

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M. CHON

MR. JEON: I think we have to give her the document first.

MS CHUANG: (Handing.)

Q. Yes.

MR. YI: I'm now going to have Exhibit 3 marked and then Exhibit -- it is a copy of the application for permission to enter plea of guilty which was filed in the criminal case.

(Plaintiff's Exhibit 3, Application For Plea was marked for identification, as of this date.)

Q. Ms. Chon, I'm showing you what's been marked as Exhibit 3 to your deposition. Is this a copy of application for permission to enter plea of guilty that was filed in the criminal case United States America versus Miye Chon a/k/a Karen Chon on March 22nd, 2016?

A. Yes.

Q. I'm going to ask you to turn page 7 of this exhibit.

THE INTERPRETER: 3, or --

MR. YI: Yes, this is Exhibit 3.

Q. Does page 7 reflect your signature above the line defendant?

A. Yes.

Page 20

M. CHON

Q. And that's your signature?

A. Yes.

Q. And did you sign this document on or about March 22nd, 2016?

A. Yes.

Q. And did you sign this document after you consulted with Mr. Jeon, your counsel?

A. Yes.

MR. YI: Thank you. I am now going to ask that Exhibit 4 be marked, copy of the plea agreement, dated March 21, 2016.

(Plaintiff's Exhibit 4, Plea Agreement Dated 3/21/16 was marked for identification, as of this date.)

Q. Ms. Chon, I'm showing you what's been marked as Exhibit 4 of your deposition. Is this a copy of the plea agreement that you entered into with the U.S. Attorney's office for the District of New Jersey dated March 21, 2016?

A. Yes.

Q. I'm going to ask you to turn to page 8 of this Exhibit 4. Above the signature line, Miye Chon a/k/a Karen Chon, is that your signature?

Page 21

M. CHON

A. Yes.

Q. Did you sign this agreement on or about March 21, 2016?

A. Yes.

Q. And did you sign this agreement after you consulted with your attorney, Mr. Jeon?

A. Yes.

Q. Is it fair to say that pursuant to this agreement which is Exhibit 4, you pleaded guilty to Counts 1, 2 and 29 of the superseding indictment on March 22nd, 2016, before U.S. District Judge William Walls?

MR. JEON: Go ahead.

THE INTERPRETER: The count from 20?

THE REPORTER: 1; 2; 29.

A. Yes.

Q. In pleading to Count 1 in the superseding indictment, you pleaded guilty to bank fraud, correct?

A. Yes.

Q. And in pleading to Count 2 of the superseding indictment, you pled guilty to embezzlement of funds by a bank employee?

A. Correct. Yes.

Q. And in pleading guilty to Count 29, you pled guilty to aggravated identity theft, correct?

1 M. CHON

2 A. Yes.

3 Q. Ms. Chon, is it fair to say that, that, by
4 pleading guilty to the three counts of the superseding
5 indictment, you acknowledged to the Court in the criminal
6 case that you stole money from Bank Asiana's customers,
7 correct?

8 A. Yes.

9 Q. When did you first begin stealing money from
10 Bank Asiana's customers?

11 A. 2010.

12 Q. I know this is difficult for you, but I -- can
13 you just describe to us the circumstances that led you to
14 start stealing money?

15 A. The bank, I had an account for my family, that
16 was like an instrument account like for a CD, CD account.
17 It was an account that you don't withdraw until its
18 maturity; I was managing that account.

19 Oh, I ended up withdrawing -- withdrawing that
20 money and using that money. That was my family account so
21 it was -- and so, I thought that there would be no problem.
22 So, I had that instant.

23 Q. When you say family account, Ms. Chon, who was
24 the accountholder of the account that you are referring to?

25 A. Family and friends' account.

1 M. CHON

2 Q. Could you identify?

3 A. It was --

4 Q. Again, I understand this is difficult for you,
5 but could you identify for us the accountholders of that
6 account?

7 A. Eunuchul Paek and Soryo Kim.

8 Q. Anyone else?

9 A. No, that was the account that I was managing.

10 Q. What was Mr. Eunuchul's relationship to you?

11 A. To put it exactly, that is my husband's
12 younger colleague, younger acquaintance.

13 Q. And what was Ms. Soryo Kim's relationship to
14 you?

15 A. That's my husband sister, sister-in-law.

16 Q. Is it your testimony that when you started
17 stealing money from Bank of Asiana's customers, the first
18 account that you stole from belonged to your sister-in-law,
19 Ms. Kim, and her husband, Mr. Paek?

20 A. Yes.

21 Q. So Mr. Paek and Ms. Kim were husband and wife?

22 A. No.

23 Q. No?

24 A. No, my husband's friend, and the other one, my
25 sister-in-law.

1 M. CHON

2 Q. But they were joint accountholders?

3 A. No.

4 Q. Oh, I see. So are you referring to two
5 separate accounts?

6 A. Yes.

7 Q. Okay. I apologize. I misunderstood. So
8 you're referring to one account belonging to Mr. Paek and
9 one account to Ms. Soryo Kim?

10 A. Yes.

11 Q. And were they both CD accounts?

12 A. Installment account.

13 Q. Is it fair to say that an installment account
14 is similar to a CD account in that the accountholder would
15 put money into an account for a period of time and earn
16 interest?

17 A. Okay. With a CD, you deposit the money at one
18 time and wait until -- I mean, leave it until its maturity.

19 THE INTERPRETER: Installment, right?

20 A. Installment. And every month, you deposit and
21 then you withdraw at maturity.

22 Q. Okay. And if you make any early withdrawals
23 before you complete all of the installments and you are --
24 you're assessed a penalty or some type of penalty fee,
25 correct?

1 M. CHON

2 A. Yes.

3 Q. Do you recall approximately how much money you
4 stole from Mr. Paek's installment account?

5 A. I'm not sure. I don't know for certain.

6 Q. Was it thousands of dollars or tens of
7 thousands of dollars?

8 A. Tens of thousands of dollars. Probably over a
9 hundred thousand.

10 Q. From Mr. Paek's installment account?

11 A. Yes.

12 Q. Is it fair to say that you didn't have
13 Mr. Paek's permission or authority to remove funds from his
14 account?

15 A. Right, right. No.

16 Q. Do you recall how much you stole from the
17 installment account belonging to Ms. Soryo Kim?

18 A. About \$20,000.

19 Q. And is it fair to say that you didn't have Ms.
20 Kim's permission or authority to remove the funds from her
21 account?

22 A. No, my sister-in-law knew.

23 Q. Did you have her permission and authority to
24 take money from her account?

25 A. Yes, yes. Because I was managing that

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M. CHON

account.

Q. All right. Could you describe for us how you took money out of Mr. Paek's account and Ms. Kim's account? Can you just go -- describe it to us step by step.

A. One moment, please. So, you asked me to explain the process how I took the money out step by step?

Q. Yes.

A. You do a transaction as if you are withdrawing money from the account, the CD, you make a transaction as if you are taking money/cash out of the vault.

Q. So, is it fair to say that in the case of Mr. Paek's installment account, you would -- in the computer -- bank's computer system, you would make a transfer from his account to an account, such as a deposit clearing account and then transfer from a deposit clearing account to currency and coin account?

A. Yes.

Q. And after you have tran -- you made those transfers ultimately to the currency and coin account, did you then go into the cash vault of the branch and remove the sum of money equal to the amount of the transfer?

A. Yes.

Q. You testified earlier that at least two employees of that branch, their authority was required to

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M. CHON

access the cash vault. How were you able to access the cash vault by yourself?

A. I didn't always go in by myself. Oh, okay.

There were times when there were -- we had three employees or other times there would be two employees, but usually there were two employees there. So, two people are, you know have to go into the vault together.

But if there is a customer -- oh, so it just wasn't me. I mean if there is a customer, everybody would just go in alone.

Q. Okay. So, is it fair to say that Bank Asiana's policy was that you needed at least two people's authority in order to access the cash vault but that that policy was not always followed?

A. You couldn't.

Q. So, is it your testimony that in practice, it was possible for you to access the cash vault by yourself without a second teller being present?

A. Yes.

Q. Why did you begin stealing money from Bank Asiana's customer, customers?

A. As I told you before, those two accounts -- at the time I needed some money and that money, I thought I was able to be responsible for. And those accounts, that's

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M. CHON

how I ended up doing.

Q. Let me ask it this way. What did you -- what did you do with the money? You mentioned that you stole over 100,000 from Mr. Paek's account and approximately 20,000 from Ms. Kim. What did you do with that money?

A. Can I take a break for a moment?

Q. Yes, you can. But as I told you at the outset, we can take a break after you answer the question.

MR. JEON: Do you understand the question?

THE WITNESS: Yes.

MR. JEON: Are you talking about the first 100,000, approximately, where that money went, is that your question? Or the 1.4 we're talking about?

MR. YI: No, we're talking about --

MR. JEON: Just the 100,000.

MR. YI: What we've talked about so far.

MR. JEON: Okay. Just the 100,000.

A. That was not like hundred thousand from the begin. I mean -- I mean the story, I -- I think I would need to explain from the -- everything from the beginning because I don't think I should be talking about just that 100,000.

MR. YI: Okay. Why don't we take a break at this time, and --

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M. CHON

THE VIDEOGRAPHER: Stand by. The time is 11:34. We're going off the record. This will end media unit No. 1. We're off.

(Brief recess was taken.)

THE VIDEOGRAPHER: Stand by. Go back on the record. The time is 11:47. We are back on the record. This will be the start of media unit No. 2. Counsel?

MR. YI: Thank you.

Q. Ms. Chon, earlier we talked about how you took money out of Mr. Paek's account, and you testified that you made a transfer from his account to the deposit clearing accounts and then to -- on to the currency and coin account, and thereafter, you removed the corresponding amount of cash from the cash vault, correct?

A. Yes.

Q. Did you also take money out of Mr. Paek's account and by transferring funds from his account to an account that was owned at the time by a company called UB's Pizza & Bagel?

A. Oh. The president of UB's Pizza & Bagel is Mr. Paek, Enchul Paek.

Q. Now, when you began stealing money from Mr. Paek and you started taking money out of Ms. Kim's account, did anyone at Bank Asiana know what you were

1 M. CHON
 2 doing?
 3 A. That, I'm not sure.
 4 Q. Other than Mr. Paek's account and Ms. Kim's
 5 account, did you steal money from any other accounts
 6 belonging to Bank Asiana's customers?
 7 MR. JEON: Can we use the term unauthorized
 8 removal as opposed to steal?
 9 MR. YI: That's fine.
 10 MR. JEON: Okay. Thank you.
 11 A. Yes.
 12 Q. Approximately how many additional accounts did
 13 you -- from which did you make unauthorized withdrawals?
 14 A. Sorry.
 15 MR. JEON: What time period please, up to
 16 today?
 17 MR. YI: Beginning of 2010.
 18 MR. JEON: '10. So, end or just in 2010?
 19 MR. YI: Let's stick with 2010 for now.
 20 MR. JEON: Okay. If you can remember.
 21 A. Oh, I don't know the -- the number of
 22 accounts, but the accountholders were about three to four
 23 people.
 24 Q. In addition to Mr. Paek, did you also make
 25 unauthorized withdrawals from a CD account belonging to --

1 M. CHON
 2 or CD accounts belonging to Mr. [REDACTED]
 3 A. Yes.
 4 Q. Did you also make unauthorized withdrawals
 5 from a CD account belonging to [REDACTED]?
 6 A. Yes.
 7 Q. Did you also make unauthorized withdrawals
 8 from the CD account or accounts belonging to a Mr. [REDACTED]
 9 [REDACTED]?
 10 A. Yes.
 11 Q. Did you also make unauthorized withdrawals
 12 from CD account or accounts belonging to a Mr. [REDACTED]?
 13 [REDACTED] and [REDACTED].
 14 A. Yes.
 15 Q. Did you also make unauthorized withdrawals
 16 from one or more CD accounts belonging to a Ms. [REDACTED]
 17 [REDACTED]?
 18 A. Yes.
 19 Q. Did you also make unauthorized withdrawals
 20 from one or more CD accounts belonging to a Ms. [REDACTED]
 21 [REDACTED]?
 22 A. Yes.
 23 Q. And is it fair to say that those withdrawals,
 24 unauthorized withdrawals that I just mentioned all occurred
 25 sometime beginning in 2010 through in or about

1 M. CHON
 2 October 2013?
 3 A. Yes.
 4 Q. Did there come a time when someone who worked
 5 at Bank Asiana discovered that you were stealing -- I'm
 6 sorry, you were making unauthorized withdrawals from
 7 accounts belonging to Bank Asiana's customers?
 8 A. No. What is it? Around the time, there was a
 9 merger of banks. I thought -- I thought I should tell -- I
 10 should tell them because there is an interest matter
 11 connected to CD accounts, so they'll find out, I mean,
 12 anyway, regardless. So, I told them.
 13 Q. Okay. I'm going to ask you to just go back to
 14 2010, when you began the authorize -- unauthorized
 15 withdrawals. Was anyone else employed at Bank Asiana
 16 involved in the unauthorized withdrawals?
 17 A. Yes.
 18 Q. Could you tell us who that was?
 19 A. James Ryu.
 20 Q. Can you tell us the circumstances under which
 21 Mr. Ryu became involved in the unauthorized withdrawals
 22 from accounts belonging to Bank Asiana's customers?
 23 A. I -- the accounts that I told you about
 24 before, my sister-in-law, I took the money out of that
 25 account. And you are not supposed to; that account. He

1 M. CHON
 2 knew that I did such a thing, he was aware.
 3 Q. Let me ask you, by the way, when you say James
 4 Ryu, is his Korean name or legal name Suk Joon Ryu?
 5 MR. YI: Suk Joon.
 6 A. Yes.
 7 Q. And is he the gentleman who's in this room
 8 today?
 9 A. Yes.
 10 Q. Do you remember when he first approached you
 11 and told you that he found out what you were doing?
 12 MR. HARVEY: Objection. Lack of foundation.
 13 Q. Let me rephrase the question in light of the
 14 objection. Could you tell us when -- when is the first
 15 time he approached you and told you that he knew what you
 16 were doing?
 17 MR. HARVEY: Same objection.
 18 A. I think, I think it was around after I took
 19 the money out. No. In the accounts, I was not supposed to
 20 make those, those transactions.
 21 Q. So, is it fair to say that it was sometime in
 22 2010?
 23 A. Probably so.
 24 Q. And is it fair to say that it was following
 25 your unauthorized withdrawals from Mr. Paek's account and

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1 M. CHON
2 Ms. Kim's account?
3 A. Yes.
4 Q. And do you recall where you were when -- when
5 he told you this?
6 A. In Palisades Park.
7 Q. When you say "Palisades Park," are you
8 referring to the Palisades Park branch of the bank?
9 A. The branch is on the first floor and on the
10 third floor there is a back office.
11 Q. Could you tell us how you came to meet with
12 Mr. Ryu at the Palisades Park branch?
13 A. It's not that we took the time to meet. Every
14 month we have a meeting. Not only that. I mean, I --
15 sometimes I have to bring things to Palisades Park so I
16 visit often.
17 Q. Okay. But just to clarify, at the time that
18 you spoke to him at the Palisades Park branch, you were
19 working at the Fort Lee branch of Bank Asiana, correct?
20 A. Yes.
21 Q. When he told you that, did he tell you how he
22 found out?
23 MR. HARVEY: Objection. There's been no
24 testifo -- there's been no testimony about what he said.
25 MR. YI: Okay. Fair enough.

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1 M. CHON
2 thought was borrowing. To put it easily borrowing it, you
3 know. I thought he was borrowing from the bank and then,
4 you know, it would get resolved quickly.
5 Q. What did you say in response to that?
6 A. I couldn't answer right away.
7 Q. Let me ask you this: Was it your
8 understanding that Mr. Ryu was asking you to make
9 unauthorized withdrawals from accounts belonging to Bank
10 Asiana customers in order to either lend him or give him
11 30,000?
12 A. Yes.
13 Q. And when he asked you that, did he threaten
14 you in any way?
15 A. I heard it as a threat.
16 Q. Did he say anything to you that you recall
17 that led you to believe that he was threatening you?
18 A. Because I -- I had something that I did wrong
19 first, I was afraid of it becoming/turning into a serious
20 big matter because of that.
21 Q. Do you remember Mr. Ryu saying anything else
22 at that time?
23 A. No.
24 Q. How did you end that discussion?
25 A. I couldn't decide right then. I told him I'll

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1 M. CHON
2 Q. Could you just tell us what he said to you at
3 that time?
4 A. He mentioned about those transactions and he
5 said, don't you know that you are not supposed to do this,
6 do you know this is a big -- what a big wrongdoing this is?
7 Q. Did he say anything else?
8 A. This could become a big matter like, like
9 this, like this criminal matter.
10 Q. Did he say anything else?
11 A. So I got very scared about what I did.
12 Q. Did he say anything else?
13 A. And then he asked me to lend him money.
14 Q. Did he ask you how much?
15 A. At first \$30,000.
16 Q. And what did you say?
17 A. I told him I didn't have the money.
18 Q. What did he say?
19 A. He said if I lend him the money, the way I did
20 those -- these transactions and he said that it could get
21 resolved like it wasn't going to take long for that to get
22 -- become resolved, resolved the matter.
23 Q. Ms. Chon, did he ask to borrow 30,000 or did
24 he ask you to give him 30,000?
25 A. He didn't use those exact words. What I

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1 M. CHON
2 think about it.
3 Q. Did he say anything in substance that if you
4 didn't cooperate with his request that he would turn you
5 into the authorities, in essence, report you for what you
6 had done?
7 A. No, he didn't say that, but I thought he
8 would, of course, do that.
9 Q. At the time that you had this conversation
10 with Mr. Ryu, was he Senior Vice President and Chief
11 Operating Office of Bank Asiana?
12 A. Yes.
13 Q. Did he tell you in that conversation how he
14 found out that you had made unauthorized withdrawals from
15 Mr. Paek's account and Ms. Kim's account?
16 A. No. He probably found out because other
17 people knew about it.
18 Q. Okay. Ms. Chon, I'm not asking to you
19 speculate or guess. If you know.
20 (Record read as follows: "QUESTION: Did he
21 tell you in that conversation how he found out that you had
22 made unauthorized withdrawals from Mr. Paek's account and
23 Ms. Kim's account?")
24 MR. JEON: Okay. Thank you.
25 Q. Ms. Chon, when you had this conversation with

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1 M. CHON
 2 Mr. Ryu, what was your relationship with Mr. Ryu?
 3 A. Just superior and the imperior -- employee.
 4 Q. Did you report to someone directly at the bank
 5 at that time?
 6 A. Can you repeat the question?
 7 Q. Right. So, you testified that you were the
 8 head teller at the Fort Lee branch of Bank Asiana. My
 9 question is, is there someone in the organ --
 10 organizational chart who was above you who directly
 11 supervised you?
 12 A. Branch manager.
 13 Q. Okay. Who was that?
 14 A. Tai Kyo Suh.
 15 THE INTERPRETER: Suh is the last name.
 16 Q. And at that time, was Mr. Ryu's one of his
 17 duties and responsibilities as the bank's vice president
 18 and COO to supervise employees like you?
 19 A. Yes.
 20 Q. When he asked for the \$30,000 in that
 21 conversation, did he tell you yes needed it?
 22 A. No.
 23 Q. When was the next time you spoke to him?
 24 A. Maybe the following -- I think it was two days
 25 after.

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1 M. CHON
 2 the 30,000 that he asked for?
 3 A. Yes.
 4 Q. Could you describe to us how you were able to
 5 come up with the 30,000 that he had asked for?
 6 A. The same way through the account using the
 7 account.
 8 Q. When you say the same way using the account,
 9 are you referring to the unauthorized withdrawals from CD
 10 accounts either an installment account or CD account?
 11 A. Yes.
 12 Q. Do you recall whose account you made that
 13 withdrawal from?
 14 A. Probably Eunchul Paek.
 15 Q. Ms. Chon, I'm not asking you to guess or
 16 speculate. If you recall.
 17 A. I don't know.
 18 Q. Is it fair to say that you made an
 19 unauthorized withdrawal in the amount of \$30,000 from an
 20 account belonging to a Bank Asiana customer and gave that
 21 30,000 to Mr. Ryu?
 22 A. Yes.
 23 Q. And is it fair to say that the \$30,000, that
 24 of unauthorized withdrawal, you did it the same way that
 25 you had testified earlier which was making transfers

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1 M. CHON
 2 Q. Did you speak to him in person or by
 3 telephone?
 4 A. By bank telephone.
 5 Q. When you said "bank telephone," were you
 6 working at the Fort Lee branch at the time?
 7 A. Yes.
 8 Q. Did you call him or did he call you?
 9 A. I think I called him.
 10 Q. And was it during business hours of the bank?
 11 A. Yes.
 12 Q. Do you remember what you said to him and what
 13 he said to you?
 14 A. I called him saying that I got it regarding
 15 that.
 16 Q. What do you mean by that?
 17 A. Oh, I would lend him what he proposed; I will
 18 do it.
 19 Q. Did he say anything to you at that time?
 20 A. No.
 21 Q. Was there any discussion between the two of
 22 you at that time about how you would -- how you would come
 23 up with the 30,000?
 24 A. No.
 25 Q. And did there come a time where you gave him

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1 M. CHON
 2 ultimately to -- I'm sorry, just a minute, please -- to
 3 currency and coin account and thereafter removing the cash
 4 equivalent to the transfer amount out of the cash vault?
 5 A. Yes.
 6 (Whereupon, Mr. Ryu leaves the room.)
 7 Q. Do you recall how you gave him the \$30,000 in
 8 cash?
 9 A. The same. I went to the off -- that office.
 10 I went to the branch. I went to the room.
 11 Q. Okay. Is it fair to say that you personally
 12 delivered the cash of \$30,000 to Mr. Ryu?
 13 A. Yes.
 14 Q. And when you gave it to him, you were in his
 15 office?
 16 A. Yes.
 17 Q. Was there anyone present other than the two of
 18 you?
 19 A. No. In the room?
 20 Q. Yes.
 21 A. No.
 22 Q. Was the cash in an envelope, or a --
 23 A. Yes, in the envelope. In an envelope. It was
 24 not the envelope for money. It was a -- just a large, it
 25 was a large envelope.

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M. CHON

Q. Was it a large envelope belonging -- was it a bank envelope?

A. We have envelopes to deliver documents between like among branch/branches.

Q. So it's an interoffice bank envelope, bank envelope?

A. Yes.

Q. When you gave him the money, did he say anything to you?

A. No. I asked him when he could, you know, return it/pay back. He said it wasn't going to take long, it would get resolved shortly and but didn't say exact date.

Q. By the way, when you said earlier that you considered the unauthorized withdrawals from Mr. Paek's account, Ms. Kim's account to be borrowing, did you say that because you intended to come up with money and replenish those accounts?

A. Yes, when I first -- when I first began doing it just by myself.

Q. And was it your understanding that when you gave the \$30,000 to Mr. Ryu, and Mr. Ryu made the statement to you that you testified to, was it your expectation that he would pay back the \$30,000 so that you could then

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M. CHON

replenish the account from which you made the unauthorized withdrawal?

A. Yes.

Q. Did he ever repay the \$30,000?

A. No.

Q. Did you ever replenish the account from which you made the \$30,000 unauthorized withdrawal?

A. No. In the end, as a -- I mean ultimately Eunchul Paek's account was replenished.

Q. And Mr. Paek's account was replenished and Ms. Kim's account was replenished by making unauthorized transfers from accounts belonging to other Bank Asiana's accounts, correct?

A. Only Eunchul Paek's account.

Q. Did there come a time where Mr. Ryu asked you for additional monies?

A. Yes.

Q. Do you recall when that was?

A. I don't know when. It was sometime after that instant.

Q. Approximately how many times did Mr. Ryu ask you for money?

A. Around ten times.

Q. And is it fair to say that those ten times

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M. CHON

occurred sometime between 2010 and 2013?

A. Approximately.

Q. And in each instance when he asked you for money, did he specify the amount that he wanted?

A. Yes.

Q. You mentioned, you testified that the first time he asked you for \$30,000; do you remember how much he asked you for the second time?

A. Second time maybe it was \$20,000.

Q. Do you remember the amount that he asked for the third time?

A. I don't know the amount, but the amount kept getting larger.

Q. When he asked you for money approximately ten times that you testified to, did you at any time say no?

A. I have not told him so. I just kept -- I kept asking when this was going to get resolved. He kept saying the same -- what is it? He said, you know, he will resolve it shortly, yes.

Q. Of approximately ten times that he asked you for money and you mentioned that the amount kept getting larger, do you recall the largest amount of money that he asked you for?

A. Hundred thousand dollars.

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M. CHON

Q. In each of those instances, did you make one or more unauthorized withdrawals from accounts belonging to Bank Asiana's customers in order to give Mr. Ryu the money he asked for?

A. Yes. But such a large amount cannot be done at one time so I did it over several occasions.

Q. And on those several occasions, did you give him the money or deliver the money to him in the manner that you described earlier?

A. Yes, always in cash.

Q. And was it always in the interoffice or interbank delivery envelope?

A. Yes.

Q. And did you personally deliver it to him to his office?

A. No, not every time. He often -- he would visit the Fort Lee branch often.

Q. So is it fair to say that on some occasions, you delivered the cash in the envelope to him to his office and on some occasions, he came to the Fort Lee branch to pick up the envelope from you?

A. Yes.

Q. On all of the occasions when you personally delivered the cash to him in the envelope, do you recall

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1 M. CHON
 2 any -- any occasions when someone else was present in his
 3 office?
 4 A. Okay. There are a lot of employees in the
 5 office, but he was in the room. So, whether there was
 6 somebody else, I don't recall exactly. I don't remember.
 7 Q. When he came to the Fort Lee branch to pick up
 8 the cash in the envelope from you on those occasions, do
 9 you recall whether there was anyone present other than you
 10 and Mr. Ryu when you handed him the envelope?
 11 A. There was an employee.
 12 Q. Do you recall the approximate total amount
 13 that you gave to Mr. Ryu?
 14 A. Approximately 700- to 8,000 -- \$800,000.
 15 Q. And do you remember the approximate total
 16 amount that you kept for yourself?
 17 A. 2- to \$300,000.
 18 Q. Did you ever tell anyone at Bank Asiana about
 19 what was going on starting in 2010 through 2013 that we
 20 just -- that you just testified about?
 21 A. No.
 22 Q. To your knowledge, did any employee at Bank
 23 Asiana find out that you were making unauthorized
 24 withdrawals from customers' accounts and that you were
 25 keeping some of the money for yourself and giving the rest

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1 M. CHON
 2 to Mr. Ryu?
 3 A. Did anyone find out?
 4 Q. To your knowledge.
 5 MR. JEON: Prior to Wilshire State Bank --
 6 prior to Wilshire State's own investigation?
 7 MR. YI: Yeah.
 8 A. I mean, no. I mean in my thinking, what I
 9 think? I mean, should I tell you or should I not tell you?
 10 Q. I'm not asking you to -- I'm not asking for
 11 your opinion. I'm not asking for your guess. If you know.
 12 A. No.
 13 MR. JEON: I think this is a good time to
 14 break. It's 20 to 12:00. I'm going up to Judge Walls.
 15 One hour, right? About one hour?
 16 THE VIDEOGRAPHER: Wait. Let me get off the
 17 record. Stand by. The time is 12:39. We are going off
 18 the record. This will end media unit No. 2.
 19 (Recess was taken.)
 20 THE VIDEOGRAPHER: The time is 1:33. We are
 21 back on the record. This will be the start of media unit
 22 No. 3.
 23 BY MR. YI:
 24 Q. Good afternoon, Ms. Chon. Just wanted to
 25 remind you that you're still under oath.

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1 M. CHON
 2 A. Yes.
 3 Q. You testified earlier that you estimate the
 4 total amount of the money you gave to Mr. Ryu to be 700,000
 5 to 800,000?
 6 MR. HARVEY: Object to the question. I don't
 7 believe that's what she testified. I believe she said
 8 800,000.
 9 Q. Approximately 800,000. Did you keep any
 10 records concerning the money you gave to Mr. Ryu in the
 11 manner you described before the lunch break?
 12 A. No, none.
 13 Q. You also testified that of the unauthorized
 14 withdrawals you kept for yourself somewhere between 200,000
 15 and 300,000?
 16 MR. HARVEY: Object to the form of the
 17 question. Again, I thought she said 200,000.
 18 MR. JEON: She gave a range of 200- and
 19 300,000. She gave a range of 200,000 to 300,000. She also
 20 -- the previous question also gave a range from 700- to
 21 800,000. I think you're just maxing out and minimizing
 22 out.
 23 MR. HARVEY: Oh, okay. Okay. I looked at my
 24 notes. She did give a range, I agree.
 25 Q. Did you keep any records concerning the monies

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1 M. CHON
 2 that you kept for yourself?
 3 A. No.
 4 Q. You mentioned how you delivered the cash to
 5 Mr. Ryu. How did you communicate with him concerning your
 6 delivery of cash to Mr. Ryu?
 7 A. By telephone.
 8 Q. When you say "telephone," what do you mean?
 9 A. Telephone at the bank, bank's interoffice
 10 telephone.
 11 Q. On your end, did you have a telephone that was
 12 assigned to you at the Fort Lee branch?
 13 A. Yes.
 14 Q. Do you recall what that number was?
 15 A. I don't know.
 16 Q. Back in 2010, did you have a cell phone or a
 17 mobile phone?
 18 A. Yes.
 19 Q. And the number of your cell phone from 2010,
 20 has that number remained the same to today?
 21 A. Yes.
 22 Q. And what is that number?
 23 THE WITNESS: 646-265-8830.
 24 A. 646-265-8830.
 25 MR. YI: At this time, I'm going to have a

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M. CHON

document marked as Exhibit, what are we up, 5 to this deposition.

(Plaintiff's Exhibit 5, Statement was marked for identification, as of this date.)

Q. Ms. Chon, I'm showing you a document that's been marked as Exhibit 5 to your deposition. I'm going to ask you turn to the second page of this document and I'm going to direct your attention to fourth line down, "No. 014, your name Miye Chon, Karen, parenthesis, AVP and Operations Office."

Do you see that there's a direct telephone number 201-676-2108?

A. Yes.

Q. To the best of your recollection, was that the phone number that was assigned to you at the Fort Lee branch at Bank Asiana?

A. Yes.

Q. And is that the telephone number that would have been used for you to make calls and receive calls during your employment at the Fort Lee branch of Bank Asiana?

A. Although these numbers are all direct numbers, there is a separate main number, telephone number and among

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M. CHON

employees, you use the extensions, extension numbers.

Q. And the extension number that you used at the Fort Lee branch during your employment was 5601?

A. Yes.

Q. When you made a phone call from the telephone call number that was assigned to you, was that number 201-676-2018?

A. So, among employees, you use the extension number, but when you make the outgoing call, I'm not sure if this number shows this particular or the main number on the receiving end.

Q. And to the right, the cell phone number indicated there 646-265-8830, was that your cell phone during your employment with Bank Asiana?

A. Yes.

Q. And I'm going to ask you to look two lines up from your name with the number "002, Suk J. Ryu, with James in parenthesis, SVP, and COO;" do you see the number 201-282-5503?

A. Yes.

Q. And you see the extension number 5503?

A. Yes.

Q. When you made a phone call to Mr. Ryu, did you dial the extension number 5503?

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M. CHON

A. Yes.

Q. And when you look at the cell phone number for Mr. Ryu indicated to the right 213-770-2828, to the best of your recollection, was that Mr. Ryu's cell phone number during your employment at Bank Asiana?

A. Yes.

Q. Thank you.

Is it fair to say that when you made phone calls to Mr. Ryu, you always used the telephone, your work telephone at Bank Asiana?

A. Yes.

MR. HARVEY: Objection. Asked and answered.

Q. Did you ever make any phone calls to Mr. Ryu from your cell phone during non-working hours?

A. I don't think so.

Q. Do you recall any phone calls to Mr. Ryu which you originated from your cell phone as opposed to your work phone?

MR. HARVEY: Objection. Asked and answered.

A. Yes, there was.

Q. Do you remember approximately how many times?

A. Are you asking me for the period when I was working?

Q. Let's start with that, yes.

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M. CHON

A. Probably there were times.

Q. What about after you left Bank Asiana?

A. After I left I had called.

Q. Do you remember how many times approximately?

A. About two or three time.

Q. On the occasions when Mr. Ryu called you, did he always you when you were at work at the Fort Lee branch of Bank Asiana?

A. Yes.

Q. Did he ever call you, during your employment at Bank Asiana, did he ever call you after hours, after working hours?

A. Yes. Relating to bank matters, emergency situations but rarely, almost none. Rarely.

Q. With respect to Mr. Ryu's request for monies from you and your delivery of monies to him, did he ever make calls to you on your cell phone during your employment at Bank Asiana?

A. No.

Q. When you were employed with Bank Asiana, did you have a home telephone number, home telephone?

A. No.

Q. Did you ever communicate with Mr. Ryu by email?

1 M. CHON

2 A. For privately, no.

3 Q. Did you communicate with Mr. Ryu by email
4 concerning work matters at Bank Asiana?

5 A. Company email, bank email.

6 Q. To the best of your knowledge, did any of that
7 email correspondence -- in those email correspondences, did
8 you ever discuss with him the monies that he asked from you
9 and the monies you in turn delivered to him?

10 A. No.

11 Q. Did you communicate with Mr. Ryu at any time
12 during your employment at Bank Asiana by text?

13 A. No.

14 Q. During your employment at Bank Asiana, did you
15 ever communicate with Mr. Ryu by letter?

16 A. No.

17 Q. Did Mr. Ryu ever send you any greeting cards
18 during your employment at Bank Asiana?

19 A. No.

20 Q. Did he ever send you any greeting cards after
21 you left Bank Asiana's employ?

22 A. I'm not sure what greeting card is exactly.

23 Q. By greeting card, I mean birthday card,
24 holiday card, thank you card, of that nature.

25 A. No. Right before I left, I left -- we -- we

1 M. CHON

2 had dinner -- we had a meal between, you know, Irene Lee
3 and James Ryu, three of us. Or at the time, I received
4 something like a gift card, but I think that was given by
5 -- I thought that was given by the bank.

6 Q. Okay. I'd like to go back a little bit. You
7 mentioned before the break that in one of your
8 conversations with Mr. Ryu about monies he wanted you to
9 deliver to him that you had asked him when this was going
10 to get all resolved and he said that it would be resolved
11 shortly, what was your understanding of the word "resolved"
12 or "resolution"? What did you understand that to be?

13 A. Make up the money. Pay back the money.

14 Q. And did Mr. Ryu ever pay back the monies that
15 you delivered to him at any time?

16 A. No.

17 Q. Before you left Bank Asiana -- withdrawn.

18 When did you leave Bank Asiana's employ?

19 A. As the banks merged. At the time merger.
20 October 2013.

21 Q. I represent to you that the effective date of
22 the merger between Bank Asiana and Wilshire Bank known at
23 that time as Wilshire State Bank was October 1st, 2013.
24 Does that refresh your recollection as to around when you
25 left Bank Asiana's employ?

1 M. CHON

2 A. It was in the first week, probably Friday.

3 Q. When you say first week, probably Friday, are
4 you referring to the month of September 2013?

5 A. No. October.

6 Q. Okay. Before you left the Bank Asiana, did
7 you have a meeting or conversation, telephone conversation
8 with Ms. Ryu, concerning the monies that you had delivered
9 to him?

10 A. Yes.

11 Q. Do you remember when that was?

12 A. When we start talking about it was when we
13 heard about the merger. So, I heard about it. I kept -- I
14 start asking him to resort the matter quickly. And from
15 that point on, I thought things were going wrong.

16 Q. When you say you asked him to resolve the
17 matter, do you recall what you actually said to him?

18 A. To pay back the money quickly.

19 Q. And what did he say to you at that time?

20 A. He said he doesn't know about it, you know,
21 what are you talking about. So I've been thinking
22 something like this could happen. Since then I started
23 thinking now it was becoming a situation. I might end up
24 being responsible for by myself.

25 THE REPORTER: What was the last part?

1 M. CHON

2 THE INTERPRETER: For -- responsible for by
3 myself on my own.

4 A. I made a few more telephone calls. And at the
5 time, he said the same, like, he said he no connection to
6 that and who -- he said who actually carried out this, you
7 know, actually, actually acted on it, who did this
8 actually.

9 Q. When he said that to you in those telephone
10 conversations, what did you say to him?

11 A. I couldn't say anything. From the point on, I
12 start just thinking about things on my own how to solve
13 this issue.

14 Q. So is it your testimony that when you began
15 discussions with him in anticipation of the merger sometime
16 prior to October 2013, he denied any knowledge or
17 involvement to you?

18 A. Yes.

19 Q. Do you remember how many phone calls
20 approximately you had with him after you found out about
21 the merger prior to October 2013?

22 A. I heard about the merger and I called him and
23 I asked him to pay back quickly because I was -- I was
24 really nervous; at first he said okay. After that ever
25 since I was very nervous. I don't recall exactly. I

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1 M. CHON

2 re-asked him several times.

3 Q. And those telephone calls you made to Mr. Ryu,
4 did you make it from your work telephone at the Fort Lee
5 branch at Bank Asiana?

6 A. Yes.

7 Q. Did you make any of those phone calls from
8 your cell phone, to your knowledge?

9 A. I don't recall.

10 Q. And --

11 A. I don't think I did.

12 Q. -- when you made those phone calls to Mr. Ryu,
13 did you call him at his work telephone at the Palisades
14 Park branch of Bank Asiana?

15 A. Yes.

16 Q. After you had these telephone conversations
17 with Mr. Ryu prior to the merger in October 2013, after he
18 denied any involvement, after he denied any knowledge, did
19 you tell anyone what Mr. Ryu had said to you?

20 A. No.

21 MR. YI: At this time, I'm going have a
22 document marked as Exhibit 6 for this deposition.
23 (Plaintiff's 6, Memorandum Dated
24 1/23/14, was marked for identification,
25 as of this date.)

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1 M. CHON

2 Q. Ms. Chon, I am going to direct your attention
3 to the date of January 23, 2014. Do you recall having a
4 meeting with employees of Wilshire Bank on that day?

5 A. Yes.

6 Q. Did you meet with Alicia Lee, Irene Lee and Bo
7 Yun Lee on that day?

8 A. Yes.

9 Q. And was the meeting at the South Palisades
10 Park branch of Wilshire Bank?

11 A. No, that was for -- between Irene Lee and Bo
12 Yun Lee.

13 Q. Okay. I'm referring to a meeting that
14 occurred on January 23, 2014. Who did you meet with that
15 day?

16 A. Oh, at a bakery that is in front of the
17 Palisades Park branch. I met with Irene Lee and Bo Young
18 Lee and later and together with Alicia Lee. We met at Fort
19 Lee at a bakery.

20 Q. Okay. I just want to clarify what you just
21 testified to. So, is it fair to say that you had a meeting
22 with all three of them, Alicia Lee, Irene Lee and Bo Yun
23 Lee, in a bakery in Fort Lee, New Jersey that day?

24 A. Yes.

25 Q. And at that time Alicia Lee was First Vice

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1 M. CHON

2 President and Operations Administration Manager of Wilshire
3 Bank?

4 A. I don't know. I'm not sure about this, but
5 yes.

6 Q. And at that time Irene Lee was Assistant Vice
7 President and Operations Administration Officer of Wilshire
8 Bank?

9 A. Yes. But even from Bank Asiana times.

10 Q. Okay. And Irene Lee's legal name is Jin Hee
11 Lee, correct?

12 A. Yes.

13 Q. And do you recall Bo Yun Lee's title or
14 position?

15 A. VP and HR. HR manager, yeah. HR, human
16 resources manager.

17 Q. Could you describe to us the circumstances
18 that, leading up your meeting with Alicia Lee, Irene Lee
19 and Bo Yun Lee at the bakery at Fort Lee?

20 A. I quit my work and in relation to the
21 instant -- Irene Lee called me regarding the interest on
22 the CD accounts. I kept getting inquires, questions. So,
23 I thought I could just not leave this alone and so I told
24 her that I would like to have a meeting.

25 And so at first I met with Bo Young Lee and

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1 M. CHON

2 Irene Lee in Palisades Park, bakery, I think. And they
3 made a -- prepared a report, I think, but I don't know
4 exactly. So, a few days later I met also with Alicia Lee
5 and Bo Young Lee and Irene Lee and we talked about this.
6 So, I told them all the things that went on at that
7 meeting.

8 Q. All right. So is it fair to say that you had
9 two meetings; the first meeting was at a bakery in
10 Palisades Park with Irene Lee and Bo Yun Lee?

11 A. Yes.

12 Q. And the second meeting was at a bakery in Fort
13 Lee, New Jersey and at that time you met with all three of
14 them, Alicia Lee, Irene Lee and Bo Yun Lee?

15 A. Yes.

16 Q. Okay. Let's start with the first meeting at
17 the bakery in Palisades Park with Irene Lee and Bo Young
18 Lee.

19 A. Yes.

20 Q. Please tell us what they asked you and what
21 you told them at that meeting.

22 A. I told them everything, you know, the way --
23 how things happened and they heard my story and after
24 hearing me, I think, they asked me a few questions.

25 Q. Okay. To the best of your recollection, could

1 M. CHON
2 you specify for us what they asked you and what you told
3 them at that meeting?
4 A. I told them how I took the money out of the CD
5 account and, you know, who was involved. At the time I
6 don't think I told them who it was.
7 Q. When you say "at that time" -- I didn't tell
8 -- "I don't think I told them who it was," are you
9 referring to Mr. Ryu?
10 A. Yes.
11 Q. What else do you remember telling them at that
12 meeting?
13 A. I told them what I've been talking about up to
14 this point. Everything.
15 Q. Okay. Let's go to the second meeting, the
16 meeting with all three of them at the bakery in Fort Lee,
17 New Jersey. What do you recall them asking you and what do
18 you recall telling them?
19 A. The same story.
20 Q. Let's go back to the first meeting with just
21 Irene Lee and Bo Young Lee. Do you recall whether either
22 of them recorded the conversation with you?
23 A. I don't know.
24 Q. Back to the second meeting with all three of
25 them, do you recall whether any of the three of them

1 M. CHON
2 recorded their conversation with you?
3 A. I don't know.
4 Q. Do you recall any of them telling you that
5 they would be recording the conversation?
6 A. They have not told me so.
7 THE VIDEOGRAPHER: Christine, just tell her to
8 keep her voice up. It's starting to go down a little.
9 THE INTERPRETER: Okay.
10 THE VIDEOGRAPHER: Thank you.
11 THE INTERPRETER: You can hear me, right?
12 THE VIDEOGRAPHER: Yeah.
13 Q. Other than those two meetings, did you have
14 any subsequent meetings with any employees or officers of
15 Wilshire Bank concerning your unauthorized withdrawals?
16 A. Yes. One more time.
17 Q. Okay. Before we get to that, let me ask you
18 this: The two meetings that we were just discussing, did
19 those two meetings occur on the same day?
20 A. No.
21 Q. Is it fair to say that the second meeting with
22 all three of them occurred on January 23, 2014?
23 A. Three people together with Alicia?
24 Q. Yes.
25 A. I don't know the exact date. January 21st is

1 M. CHON
2 my birthday, so now I remember. The next day I met with
3 Irene Lee and Bo Young Lee.
4 Q. All right.
5 A. And I don't know how many days after.
6 Q. Okay. Before you met with Irene Lee and Bo
7 Young Lee at the bakery in Palisades Park, New Jersey on or
8 about January 22nd, 2014, did you have a telephone
9 conversation with Mr. Ryu?
10 A. I called him, but I don't know when that was.
11 But I called him after meeting with Wilshire Bank people.
12 Q. When you say "after meeting with Wilshire Bank
13 people," which meeting are you referring to?
14 A. I think, probably, I think it was after the
15 second meeting.
16 Q. Okay. Your first meeting with Irene Lee and
17 Bo Young Lee on or about January 22nd, did you call Mr. Ryu
18 prior to that first meeting?
19 MR. HARVEY: Objection. Asked and answered.
20 A. I didn't call before.
21 Q. Do you recall any phone calls to Mr. Ryu in
22 which you told him that you would be meeting with either
23 employees or officers of Wilshire Bank?
24 A. No.
25 Q. The telephone call that you just mentioned

1 M. CHON
2 following the meeting with representatives of Wilshire
3 Bank, do you recall what you said to Mr. Ryu?
4 A. When I called him after I met with him?
5 Q. Yes.
6 A. I asked him to meet with me.
7 Q. Why?
8 A. Because I was going to tell him that I
9 reported everything.
10 Q. And when you say "I reported everything," are
11 you referring to the fact that you had told representatives
12 of Wilshire Bank not only about what you had done but also
13 what Mr. Ryu had done?
14 A. Yes.
15 Q. And do you recall what he said to you at that
16 time?
17 A. Oh, I told him -- this is something that I
18 told him upon meeting with him in person.
19 Q. So is it fair to say that phone call occurred
20 -- withdrawn.
21 Do you recall when you called him, do you
22 remember the approximate date relative to your date of
23 birth of January 21?
24 A. I think I made a call right -- right away, but
25 I don't know exactly.

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1 M. CHON
 2 Q. And did you meet with him on the same day that
 3 you made the phone call to him?
 4 A. Yes, I think so.
 5 Q. Do you recall where you met him?
 6 A. Yes.
 7 Q. Where?
 8 A. Englewood.
 9 Q. Where specifically?
 10 A. I think it was at a diner.
 11 Q. Do you remember the name of the diner?
 12 A. I don't know the name. I know where it is.
 13 Q. Do you remember the street it was on?
 14 A. On Grand Avenue.
 15 Q. What do you remember him saying to you and you
 16 saying to him at that meeting?
 17 A. I said, you know, I told Wilshire Bank people
 18 everything. I asked him one more time at the time to
 19 resolve this matter however. And he denied the same that
 20 he has no knowledge of it.
 21 Q. When you say you asked him again at that
 22 meeting to resolve the matter, what specifically did you
 23 ask him?
 24 A. To pay back the money.
 25 Q. What else did you say to him?

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1 M. CHON
 2 question the second time?
 3 THE INTERPRETER: Yes.
 4 Q. Do you recall at that meeting Mr. Ryu advised
 5 you to retain counsel?
 6 A. To retain a lawyer? He mentioned something
 7 about a lawyer, but I don't remember exactly what he said
 8 what -- in what substance.
 9 Q. Did he tell you at that meeting in substance,
 10 hey, you better go get a lawyer?
 11 A. No.
 12 Q. All right. You mentioned that after the first
 13 two meetings that we discussed there was a third meeting
 14 with representatives of Wilshire Bank. Do you recall when
 15 that was?
 16 A. I think it was in February.
 17 Q. Are you referring to a meeting that you had
 18 with Wilshire Bank's general counsel or chief legal
 19 officer, Lisa Pai.
 20 A. I don't know who he was. I just had a
 21 meeting.
 22 THE REPORTER: "I just had" --
 23 THE INTERPRETER: "I just had a meeting."
 24 Q. Do you remember meeting with Lisa Pai, the
 25 chief legal officer of Wilshire Bank on February 12, 2014,

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1 M. CHON
 2 A. I mean he knew -- he knew well about this kind
 3 of matter because he's been working in bank -- in a bank a
 4 long time. He knew about these things. So I asked him
 5 then what happened to me; he said that I would be punished
 6 from his experience, speaking from his experience.
 7 Q. You testified that at that meeting Mr. Ryu
 8 again denied any involvement or knowledge. What do you
 9 recall him specifically saying to you, to the best of your
 10 recollection?
 11 A. He said the same, is there any proof that he
 12 did it himself? The person who processed this is you, he
 13 said, up to now.
 14 Q. Do you remember anything else that he said?
 15 A. He just repeated the -- such, you know, such
 16 things, the same.
 17 Q. Did he -- at that meeting, did he -- do you
 18 recall whether he asked you or told you not to cooperate
 19 with representatives of Wilshire Bank?
 20 A. Oh, I don't understand the -- I didn't
 21 understand the question.
 22 I don't recall.
 23 MR. HARVEY: May I ask a point of
 24 clarification of the translator. The question you just
 25 asked her the second time, were you just repeating the

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1 M. CHON
 2 at a hotel in Fort Lee, New Jersey?
 3 A. Yes.
 4 Q. Do you recall how that meeting was arranged?
 5 A. I'm not sure whether it was Irene Lee or Bo
 6 Young Lee, but I got a telephone call from one of them, so
 7 they said they wanted to meet with me so we ended up
 8 meeting.
 9 MR. YI: Did you want to take --
 10 MR. JEON: I'm taking a break by myself.
 11 Q. Ms. Chon, are you okay or can we continue or
 12 would you like to take a short break?
 13 A. I can continue.
 14 Q. You testified earlier about meeting with
 15 Mr. Ryu at a diner. Did you have any meetings with special
 16 agents of the FBI prior to the meeting with Mr. Ryu?
 17 A. Yes.
 18 Q. Do you remember when that was?
 19 A. The first time I met with him was after
 20 meeting with Wilshire Bank people and told them everything.
 21 Q. Do you remember who you met with?
 22 A. FBI?
 23 Q. Yes.
 24 A. Nathan Kim and another person. I don't
 25 remember the name.

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1 M. CHON

2 Q. Was it Special Agent Joel Decapua,
3 D-E-C-A-P-U-A?

4 A. Yes.

5 Q. Anyone else?

6 A. Those two.

7 Q. Do you remember where the meeting was?

8 A. They came to my home.

9 Q. Is it fair to say that meeting took place
10 after January 23, 2014?

11 A. Yes, after.

12 Q. And what do you remember them asking you and
13 you telling them?14 A. From the beginning, like what you asked, like,
15 you know, my background, when I came to the U.S.; all of
16 that. And -- and related to the bank.17 Q. And when you say "related to the bank," are
18 you referring to the unauthorized withdrawals that you made
19 from customers' accounts?

20 A. Yes.

21 Q. Did you also tell them about the fact that
22 Mr. Ryu, after discovering what you had done, asking you
23 for monies and you delivering monies to him?

24 A. I didn't tell them that the first time we met.

25 Q. So, is it your testimony that at the first

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1 M. CHON

2 meeting with Special Agents Nathan Kim and Joel Decapua,
3 you didn't tell them about the fact that Mr. Ryu had asked
4 you for monies and that you had delivered monies to Mr. Ryu
5 in return?

6 A. Right. The first time I didn't tell them.

7 Q. Why not?

8 A. At the time nobody else knew about this. I --
9 my alone was -- I was responsible for this matter. I was
10 handling it on my own and I thought I was a little bit
11 frightened. I was going through a lot of thoughts. I was
12 in a state where it was very difficult mentally, very
13 difficult. At the time I thought I shouldn't tell them.

14 Q. Why not?

15 A. I was worried that something maybe could
16 happen to me. I mean at that point, I already, you know,
17 confessed that I did everything and I thought I should be
18 response -- I should take responsibility for it.19 Q. What did you mean when you said something
20 might or could happen to me? What did you mean by that?21 A. I was afraid. Maybe something bad could --
22 might happen.

23 Q. What do you mean?

24 A. In case when I -- when I say someone else had
25 me to do then I could get a revenge perhaps.

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1 M. CHON

2 Q. Ms. Chon, I want to be very clear about this.
3 As of your first meeting with the special agents, did
4 Mr. Ryu do anything that led you to believe that he had
5 threatened you in any way?6 A. No, no. I just -- that's what I felt on my
7 own.8 Q. Did he say or do anything as of that meeting
9 with the FBI agents that led you to believe that you may be
10 in danger from Mr. Ryu?

11 A. Yes, this is what I felt.

12 Q. Do you recall anything else that you told
13 Special Agents Nathan Kim and Joel Decapua the first
14 meeting?

15 A. No.

16 Q. Do you remember whether your meeting with
17 those two agents were being recorded in any way?

18 A. I don't know.

19 Q. Was there a subsequent meeting with
20 representatives of the FBI?

21 A. Yes.

22 Q. Do you remember when that was?

23 A. I met once with my attorney. Apart from that
24 I met separately.

25 Q. Okay. So is it fair to say that you met with

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1 M. CHON

2 special agents of the FBI on three separate occasions?

3 A. Yes. Two times just, you know, meeting with
4 -- only with me when they came to my home and -- and once
5 outside separately we met.6 Q. Okay. So you've testified about the first
7 time you met with Special Agents Nathan Kim and Joel
8 Decapua at your home. Was the second meeting the meeting
9 that Mr. Jeon attended?10 A. I'm not sure if that was the second meeting.
11 I think the second time was when we met separately.12 Q. Okay. The second meeting, do you recall when
13 that was?14 A. Maybe that was also in February, but I don't
15 know exactly.16 Q. It was before your meeting with Mr. Ryu at the
17 diner, correct?

18 A. You mean meeting with the FBI?

19 Q. Yes, a second meeting.

20 A. After.

21 Q. Okay. Did you have any other meetings with
22 special agents of the FBI prior to your meeting with
23 Mr. Ryu at the diner?

24 A. No, I don't think so.

25 Q. Okay. The first meeting with Special Agents

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M. CHON

Kim and Decapua, was there any discussion about arranging a meeting with Mr. Ryu?

A. Yes.

Q. Can you tell us what you remember about that discussion?

A. The first time I met with them because I have not told them about James Ryu, so it was not at that time. And later, I think I had a call with FBI and I made a -- you know, we made an arrangement to meet with James -- for me to meet with James Ryu. We made a call together.

Q. When you say "we," who are you referring to?

A. FBI.

Q. And when you say FBI, are you referring to Special Agents Nathan Kim and Joel Decapua?

A. Yes.

Q. Where were you when you made that call in their presence?

A. Libe -- library parking lot in Englewood.

Q. Were you in their vehicle at the time?

A. Yes.

Q. And did you call Mr. Ryu from your cell phone?

A. I made the call first and I think we -- it was arranged for him to call me back again.

Q. Okay. I'm just asking for your best

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M. CHON

recollection. I understand it's some time ago. You may not remember everything. You testified about your initial meeting with the special agents then you are now telling us about your phone call to Mr. Ryu in the presence of the special agents in their car.

What -- could you tell us the discussions or any meetings that took place between your initial meeting with the special agents and the phone call that you made to Mr. Ryu from their vehicle?

A. When we first met, I didn't -- I left them without talk -- telling them about Mr. Ryu. So now this is after I told them all the context; everything about Mr. Ryu. So FBI -- so, FBI had me, I mean, arranged it for me to have a meeting with them by, you know, by telephone call to get evidences.

Q. Okay. After the first, your initial meeting with the special agents, you said after that you told them about James Ryu. Was there a second meeting with the special agents?

A. No. That was done through an attorney.

Q. When you say "through an attorney," are you referring to Mr. Jeon who's sitting to your left?

A. Yes.

Q. Is it your testimony that you asked Mr. Jeon

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to speak with the special agents about Mr. Ryu?

MR. JEON: Wait. Don't answer that. That may be privileged. Whatever conversation she and I had regarding this may be privileged, so don't answer that.

MR. HARVEY: Can you have the question and answer read back, please.

(Whereupon, the record was read back by the Court Reporter.)

MR. JEON: I want to explain to her what "privileged" means.

(Whereupon, Mr. Harvey leaves the room.

MR. JEON: Where are you going?

MR. HARVEY: I'll be back.

MR. JEON: Oh, you're going to sit in.

Q. Ms. Chon, you testified earlier, I believe, that when you first met with the special agents, you had decided to take all the responsibility for what happened; is that correct?

A. Yes.

Q. And is it fair to say that at that time, you decided that you would not tell them about James Ryu's involvement, correct?

A. Yes.

Q. What made you change your mind?

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M. CHON

A. Because I thought it was so unfair.

Q. What was unfair?

A. It is certain that I did wrong. I didn't spend all that money, all the money from -- about that point.

(Whereupon, Mr. Harvey enters the room.)

Q. Let's go back to your telephone call to Mr. Ryu in the presence of the special agents in their vehicle. Do you recall what you said to Mr. Ryu and what Mr. Ryu said to you in that conversation?

A. That conversation was asking to meet.

Q. And did he agree to meet with you at that time?

A. Yes.

Q. And is that the meeting at the diner that you told us about earlier?

A. No, this is a different date.

Q. The meeting that you told us about with Mr. Ryu at a diner, did that happen before you met with special agents of the FBI?

A. The meeting at the diner, I don't know exactly. That meeting, I called him and we met. For me, in order, I mean for me to tell him that I report it the second time, FBI told me to meet him, meet with him.

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M. CHON

Q. Did the special agents of the FBI give you any other instructions about your meeting with Mr. Ryu?

A. Yes.

Q. What did they tell you?

A. To -- to induce him to say that he was involved.

Q. Did they give you any other instructions?

A. Just -- just, yeah, to keep saying -- to tell him to pay back the -- ask him to pay back the money so that, you know, I'll hear him saying.

Q. Do you recall whether they asked you to wear a recording device for this meeting?

A. No, there was a camera.

Q. When you say "there was a camera," where? What are you referring to?

A. Oh, they gave me a bag.

Q. What was in the bag?

A. I didn't look, but I heard that was the camera.

Q. Did they tell you it was a camera or audio recording device?

A. I knew it was audio. But I thought I understood that it was a camera because I was told to adjust its location.

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M. CHON

Q. Okay. Is it fair to say, though, that you do not know as you sit here today whether there was any video equipment inside that bag; is that correct?

A. I know the -- I knew that it was a videocamera.

Q. Okay. Other than what they told you, you don't know for a fact that there was a video -- any kind of video equipment in the bag, right, you don't know yourself?

A. Right.

Q. I'd like to go back to Exhibit 6 for a moment, if we may, and I'll represent to you that this exhibit is a copy of a memorandum dated January 23rd, 2014, from Alicia Lee to Elaine Jun. Alicia Lee being First Vice President and Operations Administrations Manager of Wilshire Bank to Elaine Jung Senior Vice President and Chief Operations Administrator of Wilshire Bank. Subject is BA, or Bank Asiana, unauthorized CD withdrawal incident.

The first paragraph states: "This afternoon after my arrival at South Palisades Park branch at around 12:10 p.m., Irene Lee, Bo Young Lee and I, had a meeting with Karen Chon, former BA employee who had been involved in the unauthorized withdrawals of funds from customer's CD." Do you see that?

A. Yes.

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Q. And does that statement accurately reflect the meeting that you had with the three of them?

A. Yes.

Q. The second paragraph of this memorandum, it says, "The details of the interview will be submitted separately, but to summarize today's" -- "today interview, Karen Chon confessed the unauthorized transactions were her wrongdoing and that the funds were delivered to James Ryu, BA COA," do you see that?

A. Yes.

Q. Did you, in fact, confess to them at that meeting that the unauthorized transactions were your wrongdoing and that the funds were delivered to Mr. Ryu?

A. Yes.

Q. The next paragraph states: "The initial contact was made by Mr. Ryu who had asked Karen for personal loan to which she responded no, but he had asked her if there was any way that he could" -- "we could facilitate \$10,000." Do you see that?

A. Yes.

Q. Is that an accurate statement of you told them?

MR. YI: No.

THE INTERPRETER: Oh, sorry.

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MR. YI: Let me repeat the question.

Q. Is that an accurate statement of what you told them at that meeting?

A. I'm not sure.

Q. Okay. I'm just clarifying because earlier, you told us that the first time Mr. Ryu spoke with you about the unauthorized withdrawals, he asked you for \$30,000. This memorandum refers to Mr. Ryu asking you if there was any way that you could facilitate \$10,000.

A. Although, he asked for \$30,000 but he said \$10,000 and \$10,000 separately. But I don't know -- but I don't recall clearly. I'm not sure.

Q. All right. So is it fair to say that when he asked for a specific amount of money, say, for example 30,000, it's possible that you gave him \$10,000, three separate times?

A. No. At first it was \$30,000.

Q. In one lump sum?

A. Yes.

Q. Okay. So is it fair to say that this statement in this memorandum may not be correct?

A. Yes.

Q. Okay. And the fourth paragraph of this memorandum states, "Since then, she had provided Mr. Ryu

1 M. CHON

2 with cash whenever he had asked for it and he had always
3 made contact with her through company phone and never over
4 her personal home or cell phone number." Do you see that?

5 A. Yes.

6 Q. Is that a correct statement?

7 A. Yes.

8 Q. The next paragraph says, "Deliveries of the
9 funds were always in cash according to Karen Chon and that
10 either it was delivered personal by her or Mr. Ryu would
11 stop by at her branch to pick it up." Do you see that?

12 A. Yes.

13 Q. Is that a -- is that a correct statement?

14 A. Yes.

15 Q. The next statement or the next paragraph
16 states as per Karen's statement, "Mr. Ryu mentioned to her
17 that he would -- open quote -- "compensate" -- closed
18 quote -- "her for her help" -- also in quotation marks.

19 Do you see that?

20 A. Yes.

21 Q. Is that also a correct statement?

22 A. Yes.

23 Q. When he told you that he would compensate you
24 for your help, did you know what he was talking about?

25 A. Maybe I could get promoted.

1 M. CHON

2 Q. Ms. Chon, again I'm not asking you to guess or
3 speculate, conjecture. I'm asking you whether you recall
4 Mr. Ryu saying anything specifically in this regard?

5 MR. HARVEY: Objection. You asked her -- you
6 didn't let her permit the answer to the first question.
7 The first question, did you know what she mean and she said
8 maybe a promotion. She wasn't done answering that question
9 before you cut her off. I believe she's entitled to --
10 entitled to answer that question.

11 Q. I'm sorry I cut you off. I didn't mean to.
12 Please go ahead and finish your answer.

13 A. That's how I understood it.

14 MR. YI: Could you read back, please.

15 (Record read as follows: "QUESTION: When he
16 told you that he would compensate you for your help, did
17 you know what he was talking about?")

18 Q. So when he told you he would compensate you
19 for your help, you understood the word "compensate" to be a
20 promotion? Is that your testimony?

21 A. That's just my thinking.

22 Q. All right. The next paragraph of this
23 memorandum states, "Her recollection of the accounts
24 affected where" -- and then there's some redactions there.
25 I believe the word "where" was I think meant to be were --

1 M. CHON

2 "which she approximates to be around one million dollars."
3 Do you see that?

4 A. Yes.

5 Q. Is that a correct statement?

6 A. Are you talking about the money withdrawn from
7 the CD accounts?

8 Q. Yes. The approximate total amount of the
9 unauthorized withdrawals from --

10 A. Yes.

11 Q. -- customer accounts?

12 A. Yes.

13 Q. The next paragraph states, "During the
14 interview, we have uncovered that Karen Chon has taken
15 funds from customer CDs for her husband's business use."
16 Do you see that?

17 A. This, I don't know for certain. I don't know
18 exactly. I don't know what this is talking -- what they're
19 talking about.

20 Q. You testified earlier, Ms. Chon, that to the
21 best of your recollection, approximately, 200- to 300,000
22 of the unauthorized withdrawals from customer accounts, you
23 kept for yourself, do you remember that?

24 A. Yes.

25 Q. Did you use all or a portion of those funds to

1 M. CHON

2 help your husband in connection with his businesses?

3 A. To pay off debt.

4 Q. When you say "to pay off debt," did that debt
5 or debts belong to your husband or his businesses?

6 A. What is it, that was the debt arose from close
7 or closed business.

8 THE REPORTER: Clothes?

9 THE INTERPRETER: Closed. I'm trying to
10 und -- clearly understand.

11 A. Oh. Failed business. Business went out of
12 business.

13 MR. YI: All right. We're going to take a
14 quick break at this time and we'll continue.

15 THE VIDEOGRAPHER: Stand by. The time is
16 3:17. We're going off the record. This will end media
17 unit No. 3.

18 (Brief recess was taken.)

19 THE VIDEOGRAPHER: The time is 3:29. We are
20 back on the record. This begins media unit No. 4.

21 BY MR. YI:

22 Q. Ms. Chon, I just want to clarify one point we
23 were trying to cover before the break. When you referred
24 to debts of your husband's earlier, I just want to clarify,
25 are those -- is that debt or are those debts that's of your

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1 M. CHON
2 husband or your husband's businesses?
3 A. Yes.
4 Q. This paragraph goes out to state, "She
5 admitted forging her husband's signature as well as" -- and
6 there's a redaction -- "signature to issues checks from her
7 husband's business account." Do you see that?
8 A. Yes.
9 Q. Did you, in fact, forge your husband's
10 signature in connection with his business account at Bank
11 Asiana? I'm sorry. Let me withdraw that question.
12 Do you recall during the time period of 2010
13 to 2013, did your husband maintain a bank account at Bank
14 Asiana, either your husband or his businesses?
15 A. Business account.
16 Q. You remember approximately how many?
17 A. Three.
18 Q. Was one of them account in the name of UB's
19 Pizza & Bagel, Inc.?
20 A. Yes.
21 Q. Was the other one an account under the name of
22 Bergenfield Bagel & Cafe, Inc.?
23 A. Yes.
24 Q. And was the other one Maywood Bagel, Inc.?
25 A. Yes.

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1 M. CHON
2 that the special agents gave you a bag to take with you to
3 the meeting, correct?
4 A. Yes.
5 Q. And did you meet with Mr. Ryu that day?
6 A. Yes.
7 Q. And did you meet with him also at a diner?
8 A. Different restaurant.
9 Q. But it was also a diner?
10 A. Kind of.
11 Q. Okay. Did you meet with Mr. Ryu the same day
12 that you placed a call to him from the vehicle with the
13 special agents?
14 A. Yes.
15 Q. Was that February 12, 2014?
16 A. I don't know the date.
17 Q. Is it fair to say that it was in
18 February 2014?
19 A. Maybe. I think it was February.
20 Q. Okay. Could you tell us what you remember
21 about that meeting?
22 A. At the time I met with him?
23 Q. Let's start with this, how did you get to the
24 restaurant or the diner?
25 A. I drove my car.

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1 M. CHON
2 Q. And is it correct that in connection with
3 those three business accounts, you forged your husband's
4 signature from time to time during your employment at Bank
5 Asiana?
6 A. Yes.
7 Q. Was your husband aware that you were forging
8 his signature in connection with his business accounts?
9 A. Yes.
10 Q. Is it fair to say that in addition to your
11 husband's signatures, you also forged the signatures of
12 other Bank Asiana customers who had accounts at Bank
13 Asiana?
14 A. In order to take out money? Withdraw money?
15 Q. Either to make unauthorized withdrawals or to
16 make transfers from those customers' accounts to another
17 customer's account?
18 A. No.
19 Q. Other than your husband's signature, did you
20 forge the signature or signatures of any Bank Asiana
21 customers during your employment there?
22 A. No.
23 Q. All right. Let's go back to your meeting with
24 Mr. Ryu at the diner following your call to him from the
25 vehicle with the special agents. You testified earlier

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1 M. CHON
2 Q. And what happened when you got to the diner?
3 A. I met -- we met. I said -- Oh, according to
4 what they said from Wilshire Bank, if I pay back all this
5 money to Wilshire Bank, it would be -- I'll be okay. So, I
6 asked him to pay me back that money promptly.
7 Q. And what did he say to you in response to
8 that?
9 A. Did the bank say that, did they say so, he
10 asked. So, I kept saying -- I didn't want to stimulate
11 him, like I didn't want to make him angry so I just kept
12 begging -- I kept asking him to help me to pay back, and it
13 appeared that he was thinking -- he was thinking about it.
14 Q. Can you tell us -- withdrawn.
15 What did he -- what, if anything, did he say
16 to you in return in response?
17 A. Just like what I just told you before. So, I
18 told him that from the bank's side as long as, you know, I
19 pay the money to make up the loss, they weren't going to --
20 you know, it appeared they weren't -- they said they
21 weren't going to turn it into a big issue, a big problem.
22 So I told him that. And he said -- he asked me, did the
23 bank say that for sure, and he said that he will think
24 about it.
25 And so, I mean -- and so, I said, if he can

1 M. CHON

2 also -- if -- that's a lot of money, so if he can give me
3 that money to me then I can pay back, and I can make up
4 that money, and I just kept asking him to help me.

5 Q. Do you recall him saying anything else in
6 response to what you asked him?

7 A. I mean he didn't really say much. He didn't
8 really reply. He didn't really answer for certain, in
9 certainty.

10 Q. Did you do anything or say anything at that
11 meeting to get him to acknowledge the fact that he asked
12 you for monies and that you delivered monies to him?

13 A. Whether I did, I don't recall. We just kept
14 talking about that to give me the money back.

15 Q. How did you end the meeting with him?

16 A. I think I might have said -- I think I asked
17 him to -- to contact me, give me a call.

18 Q. And what was his response?

19 A. He said he got it, yes, he got it.

20 Q. Is it fair to say that you didn't tell him
21 about the bag that you were carrying that the special
22 agents gave you?

23 A. No, I didn't.

24 MR. JEON: Stipulated.

25 Q. Since that meeting at the diner, have you met

1 M. CHON

2 with Mr. Ryu prior to today?

3 A. No, I haven't.

4 Q. Since that meeting at the diner with Mr. Ryu,
5 have you had any -- other than a meeting, have you had any
6 telephone communication with him?

7 A. No.

8 Q. Have you had any other communication
9 whatsoever with Mr. Ryu since that meeting at the diner?

10 A. No.

11 Q. Let's go back to your meeting with Lisa Pai,
12 the chief legal officer of Wilshire Bank. Is it fair to
13 say that you met with Ms. Pai after your meeting with James
14 Ryu at the diner we just talked about?

15 A. It was after we talked, yes.

16 Q. Okay. Before we get to the meeting, your
17 meeting with Ms. Pai, did you have any meetings with any
18 representatives of the U.S. Attorney's office for the
19 District of New Jersey?

20 A. I don't know if it was before. I'm not sure.

21 Q. Did there come a time when you had a meeting
22 with representatives of the U.S. Attorney's office of the
23 District of New Jersey?

24 A. Yes.

25 Q. All right. Let's go back to the meeting with

1 M. CHON

2 Ms. Pai. Do you recall the circumstances that led to that
3 meeting? And I apologize, I may have asked you this
4 question before during one of our breaks.

5 A. They wanted to meet from the bank first.

6 Q. When you say "they," who are you referring to?

7 A. I think it's one of either Bo Young Lee,
8 manager Lee, or Irene Lee.

9 Q. Do you remember having a telephone
10 conversation with Lisa Pai before meeting with her?

11 A. I don't know. I don't recall.

12 Q. Okay. Where was the meeting?

13 A. Double Tree Hotel in Fort Lee.

14 Q. Was the meeting on February 14, 2014, if you
15 recall?

16 A. I think it was.

17 Q. Was anybody there other than Lisa Pai?

18 A. I think only with her.

19 Q. And can you tell us what you remember her
20 asking you at that meeting and you telling her?

21 A. What I talked with Wilshire Bank people like
22 how I began and everything. I told her everything, the
23 same story.

24 MR. YI: At this time, I'm going to have a
25 document marked as Exhibit 7 to this deposition.

1 M. CHON

2 (Plaintiff's 7, Notes was marked for
3 identification, as of this date.)

4 Q. Ms. Chon, I'm showing you what's been marked
5 as a document that's been marked Exhibit 7 to your
6 deposition and I'm going to ask you to take a look at the
7 first page first. There's a reference to -- and I
8 represent to you that these are handwritten notes by Lisa
9 Pai of her meeting with you on February 14th, 2014.

10 On the top, it says, "Karen," dash, "meeting"
11 or MTG. And the first line says, "husband," dash,
12 "concentrates on work," does that --

13 THE INTERPRETER: Notes before meeting.

14 MR. YI: No.

15 THE INTERPRETER: Oh, okay. So not the first
16 page. We are on -- what you're talking is one, two,
17 three -- fourth page, yes? Page number four?

18 MR. YI: Yes, this exhibit actually -- the
19 first page of this exhibit should be WB2057.

20 MS. CHUANG: What does that have?

21 MR. JEON: No, 54. You have it wrong. It
22 starts at 2054, and goes in numerical order to --

23 MR. YI: Okay.

24 MR. JEON: -- 059.

25 MR. YI: Okay. If you could just turn to the

1 M. CHON
 2 page numbered WB2057 which, I believe, should be the third
 3 page of that exhibit.
 4 MR. JEON: Fourth page.
 5 MR. YI: Fourth page.
 6 Can you we make that correction right now,
 7 please? The first three pages should not be part of this
 8 exhibit.
 9 MS. CHUANG: Okay.
 10 MR. JEON: You gave us notes of your own notes
 11 they took down before the meeting. Your own prep notes, I
 12 guess.
 13 MR. YI: They're not mine.
 14 MR. JEON: I mean not yours but the bank.
 15 MR. YI: Yeah, they've been produced.
 16 MR. JEON: Okay. So are we correcting it to
 17 be 2057, 2059 or just 2057?
 18 MR. YI: 2057 and 2058 and 2059.
 19 MR. JEON: Okay.
 20 Q. Okay. On the first page, Ms. Chon, there's
 21 reference to "husband" -- dash -- "concentrates on work."
 22 Does that refresh your recollection as to --
 23 MS. CHUANG: I'm sorry, I have to give this
 24 back.
 25 THE INTERPRETER: Okay. Do it after.

1 M. CHON
 2 Pai at that meeting in which she asked you whether your
 3 husband was aware of what you had done?
 4 A. She asked me whether he knew and I answered I
 5 didn't know.
 6 Q. Do you remember telling her anything else?
 7 A. I don't know.
 8 Q. Is it fair to say that there came a time when
 9 you did tell her husband what you had done?
 10 A. After having an interview with the FBI. After
 11 that.
 12 Q. Prior to that, did your husband ask you about
 13 the monies that you kept for yourself from the unauthorized
 14 withdrawals?
 15 A. My husband was not aware at all, didn't know
 16 at all.
 17 Q. Ms. Chon, you know what a "gae" is, right,
 18 G-A-E?
 19 A. Yes.
 20 Q. Did you at any time tell your husband that the
 21 monies that you kept from the unauthorized withdrawals were
 22 sources from a Korean "gae"?
 23 A. I was always involved in this gae. And if I
 24 had any cash, he always knew it was -- it was money from
 25 gae. He assumed it was money from Gae.

1 M. CHON
 2 MS. CHUANG: Yeah, I'll do it after.
 3 Q. Does that refresh your recollection as to your
 4 conversation with Ms. Pai at that meeting about your
 5 husband?
 6 A. Yes.
 7 Q. Is it fair to say that this is reference
 8 saying her inquiry as to whether your husband was aware of
 9 what you had done?
 10 MR. JEON: Mr. Yi, I'm going to object to this
 11 line of question only because how is she going to guess
 12 what this indiv -- whoever asked her these questions, I
 13 guess Ms. Pie, I'm assuming these are her -- the notes, Ms.
 14 Pie's notes.
 15 MR. YI: Right. I'll withdraw the question.
 16 I'll rephrase the question.
 17 MR. JEON: I mean you could just ask her, hey,
 18 listen, is it -- did you tell Ms. Pie your husband didn't
 19 know about this because he's too busy concentrating on
 20 work. But to ask what these answers are responsive too,
 21 she can't guess from what happened two years ago.
 22 MR. YI: Fair enough.
 23 MR. JEON: I don't remember what I did this
 24 morning, so.
 25 Q. Do you remember having a discussion with Ms.

1 M. CHON
 2 MR. JEON: Mr. Harvey, do you need explanation
 3 on gae or are you just going to let that go?
 4 MR. HARVEY: I'm happy with the way the
 5 testimony's been going.
 6 MR. JEON: Okay.
 7 Q. I'm going to ask you to refer to the last page
 8 of this exhibit No. WB2059. During your meeting with Ms.
 9 Pai at the Double Tree Hotel, did there come a time during
 10 that meeting when Ms. Pai asked you the approximate total
 11 amount of the unauthorized withdrawals that you made?
 12 A. I think she told me how much it was.
 13 Q. Do you have any recollection of her asking you
 14 approximately the approximate total amount of the
 15 unauthorized withdrawals that you had made?
 16 A. I don't recall.
 17 Q. At that meeting, did you have any discussions
 18 with Ms. Pai about the approximate or estimated total
 19 amount of the unauthorized withdrawals that you made?
 20 (Whereupon, the record was read back by the
 21 Court Reporter.)
 22 A. I just heard -- I was told what the
 23 approximate amount was. I just -- I don't remember what I
 24 said regarding that.
 25 MR. JEON: If you looked at this document,

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1 M. CHON
 2 would it help you remember?
 3 A. I'm looking at it right now.
 4 MR. JEON: Would it help you remember? I
 5 don't know. She said it --
 6 Q. Ms. Chon.
 7 A. I don't recall exactly.
 8 Q. If you -- the last page of this exhibit
 9 WB2059, there's reference to a 1.2 mil; do you see that?
 10 Does that refresh your recollection as to the approximate
 11 total amount of the unauthorized withdrawals that you made
 12 which you discussed with Ms. Pai at that meeting?
 13 A. I think she said it was this much.
 14 Q. Okay. And during that discussion, do you
 15 remember whether you told her the approximate total amount
 16 that you had given to Ms. Ryu from the unauthorized
 17 withdrawals?
 18 A. It seems that I -- I told her that I gave him
 19 \$700,000.
 20 Q. And is that your recollection?
 21 A. Yes.
 22 Q. And do you recall whether you told Ms. Pai at
 23 that meeting during that discussion how much approximately,
 24 -- approximately how much the total amount that you kept
 25 for yourself from those unauthorized withdrawals?

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1 M. CHON
 2 A. Yes.
 3 Q. What did you tell her?
 4 A. I think I said approximately I gave Mr. Ryu
 5 \$700,000 and the rest I spent it. I kept it.
 6 MR. JEON: You caught yourself.
 7 Q. Before the lunch break earlier today, I had
 8 asked you for the approximate total amount that you had
 9 kept from the unauthorized withdrawals, you testified at
 10 that time that your estimate was in the range of 200,000 to
 11 300,000. My question to you is, as you sit here today, to
 12 the best of your recollection, is it in the range of
 13 200,000 to 300,000 or is it approximately 500,000?
 14 A. \$500,000.
 15 Q. Thank you. Could you tell us what you did
 16 with the approximately -- the approximate \$500,000 that you
 17 kept from the unauthorized withdrawals?
 18 A. As I told you before to pay off debt.
 19 Q. And I apologize if I asked this earlier, but
 20 the debt that you're referring to, the debts that you're
 21 referring to, is that the debt or debts of your husband's
 22 businesses?
 23 A. Yes, that plus personal debt, plus.
 24 Q. So the debts that you're referring to include
 25 the debts of your husband's company Bergenfield Bagel &

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1 M. CHON
 2 Cafe Inc., doing business as Cafe Clair, correct?
 3 A. That, no, no. That is the one is the current
 4 business he's doing.
 5 Q. And did the debts that you were referring to
 6 earlier include the debts of Bergenfield Bagel & Cafe,
 7 Inc.?
 8 A. No.
 9 Q. So is it your testimony that none of the
 10 approximate 500,000 was used to pay off the debts of
 11 Bergenfield Bagel & Cafe, Inc.?
 12 A. Not there. Not that.
 13 Q. Was any portion of the approximately 500,000
 14 used to pay off debt or debts of Maywood Bagel, Inc.?
 15 A. Yes.
 16 Q. Was any portion of the approximately \$500,000
 17 used to pay off the debts of UB's Pizza & Bagel, Inc.?
 18 A. Yes.
 19 Q. Was any portion of the approximately \$500,000
 20 used to pay off the debts of UB's Bagel & Cafe, Inc.?
 21 A. That, I'm not sure.
 22 Q. Was any portion of the approximately \$500,000
 23 used to pay off the debts of UBK Bagel's Corp. doing
 24 business as Franklin Bagels & Cafe?
 25 A. No.

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1 M. CHON
 2 Q. Do you know who currently owns and operates
 3 Franklin's Bagels & Cafe?
 4 A. My sister-in-law.
 5 Q. Was your husband ever an officer or
 6 shareholder of UBK Bagels Corp.?
 7 A. He was the president. No longer. Not now.
 8 Q. Is it fair to say that he either sold the
 9 shares of the corporation or the assets of the corporation
 10 to your sister-in-law at some point?
 11 A. Yes.
 12 Q. Do you remember when that was?
 13 A. Two, three years. I don't know exactly.
 14 Q. Was it before or after you left Bank Asiana?
 15 A. Before, I think, it was.
 16 Q. Do you remember the sale price?
 17 A. I don't know exactly. My husband knows.
 18 Q. I'd like to clarify one point. You said
 19 earlier that portions of the approximately 500,000 was used
 20 to pay off the debts of the three companies that we just
 21 talked about, and also, you made reference to personal
 22 debts. When you made reference to personal debts, were you
 23 talking about just you or both you and your husband?
 24 A. Mine.
 25 Q. Was any portion of the approximately \$500,000

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1 M. CHON
2 used to pay off the personal debts of your husband?
3 A. No.
4 Q. You testified earlier that you had a meeting
5 with the U.S. Attorney's office of the District of New
6 Jersey, correct?
7 A. Yes.
8 Q. How many times did you meet with
9 representatives of the U.S. Attorney's office of the
10 District of New Jersey?
11 A. Once.
12 Q. Is it fair to say that meeting took place
13 after your meetings with special agents of the FBI?
14 A. I think it was after.
15 Q. Did that meeting occur in February of 2014?
16 A. I don't know.
17 Q. Was it before or after your meeting with
18 Mr. Ryu at the diner?
19 A. After.
20 Q. Where was the meeting?
21 A. With U.S. attorney?
22 Q. Yes.
23 A. I think it was here.
24 Q. Was it at the U.S. Attorney's office?
25 A. This build -- was it this building or not?

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1 M. CHON
2 or about February of 2014, could you tell us what you
3 remember about what Mr. Murphy asked you at that meeting
4 and what you told him at that meeting?
5 A. I think it was the same story, same substance.
6 Q. When you say "same story, same substance," is
7 it your testimony that what you told Mr. Murphy at that
8 meeting is in substance substantially the same as what you
9 told the representatives of Wilshire Bank and what you told
10 the special agents of the FBI?
11 A. I don't recall exactly.
12 MR. JEON: Your question is general. You
13 might want to ask specific questions, specific substance
14 with specific --
15 Q. Right. Let's go back to that meeting at the
16 U.S. Attorney's office. Just to the best of your
17 recollection, tell us what you remember Mr. Murphy asking
18 you at that meeting and what you told him at that meeting?
19 MR. JEON: Objection as to form. Again, I
20 think it's just too general to ask her what Mr. Murphy said
21 and how she responded. If you want to ask her, for
22 example, hey, did you -- did you give that money to
23 Mr. Ryu, and did you tell him that you gave him \$700,000
24 like you told Ms. Pai, I think if you asked -- I don't mean
25 to prolong this deposition, but if you asked that way, she

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1 M. CHON
2 But it was in Newark.
3 Q. And was your attorney, Mr. Jeon, with you?
4 A. Yes.
5 Q. And do you remember who was at that meeting?
6 A. Two FBI agents, the U.S. Attorney, or a USA,
7 assistant USA prosecutor. Not the attorney, prosecutor.
8 Q. Okay. Prosecutor or U.S. Attorney or
9 assistant U.S. Attorney. Do you remember how many U.S.
10 assistants were at that meeting?
11 A. One.
12 Q. Do you remember his name or her name?
13 MR. JEON: His name.
14 A. Paul.
15 Q. Was it Paul Murphy?
16 A. Yes.
17 MR. YI: Off the record for a second.
18 THE VIDEOGRAPHER: Stand by. The time is
19 4:15. We're going off the record.
20 (Whereupon, an off-the-record discussion was
21 held.)
22 THE VIDEOGRAPHER: The time is now 4:17.
23 We're back on the record.
24 Q. Ms. Chon, just directing your attention to
25 your meeting with Assistant U.S. Attorney, Paul Murphy, in

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1 M. CHON
2 may remember, yes or no. But if you asked her what did
3 Paul say; Paul said good morning, I'm an assistant U.S.
4 Attorney, you're here; you know, she can't remember all
5 that. Heck, I can't remember all that.
6 But I can remember what she said because I
7 have my notes, but again, you have to refresh her
8 recollection almost like a cross; say, hey, did you tell
9 him that you were married; yeah, I told him I'm married,
10 for example.
11 Q. Did Mr. Murphy at that meeting ask you about
12 the unauthorized withdrawals that you made from Bank
13 Asiana's customer accounts?
14 A. Yes, how I did it. I told him about how I did
15 it and everything.
16 Q. And at that meeting, did you tell Mr. Murphy
17 that Mr. Ryu had at some point learned about what you had
18 done and had asked you for monies and that you subsequently
19 delivered sums of cash to him on approximately ten
20 occasions?
21 A. Yes.
22 Q. And was there discussion at that meeting with
23 Mr. Murphy about the approximate total amount of the
24 unauthorized withdrawals that you had made?
25 A. I don't know.

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M. CHON

Q. Did Mr. Murphy ask you at that meeting about the approximate total amount of the monies that you had given to Mr. Ryu from unauthorized withdrawals that you made?

A. I really don't know.

Q. I understand. It's late in the day and I understand that you're getting tired. Let me just ask a different way. Do you recall telling Mr. Murphy at that meeting that you had given to Mr. Ryu approximately \$700,000 from the unauthorized withdrawals?

A. Yes.

Q. Yes, you did tell him or, yes, you remember?

A. I think I told -- I think I said -- I think I told him.

Q. Did you also tell Mr. Murphy at that meeting that of the unauthorized withdrawals you kept for yourself approximately \$500,000?

A. I don't recall whether I -- whether I told him the exact number, but -- but I think I mentioned that I kept -- the fact that I kept some, kept the money.

Q. Ms. Chon, do you have anything, anything in writing that would reflect the sums of cash that you gave to Mr. Ryu from the unauthorized withdrawals?

A. There is nothing in writing for record.

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M. CHON

Q. When you were employed by Bank Asiana, did you keep a diary? Did you maintain a diary?

A. Bank diary.

Q. When you left Bank Asiana -- withdrawn.

Do you still have those diaries?

A. There was not much memo so I didn't keep it. I didn't keep the diary.

Q. Do you know where they are?

A. I think that was all thrown away at the time back then.

Q. Other than the bank's calendar or diary that you say were thrown away, did you keep or maintain during your employment with Bank Asiana any personal calendar or diaries?

A. I had a calendar.

Q. Do you have those to this day?

A. No, I don't have mine, but I have some other employees.

Q. Why do you have calendar or diaries of other -- of former Bank Asiana employees?

A. Oh, in another employee's calendar, every employee's ID and passwords were -- they were contained, included. They were contained, written and because of that, I kept it. But I'm not sure whether I still have it

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M. CHON

up to now.

Q. Were those calendar of other, either, current employees or former employees of Bank Asiana's with -- with -- would those calendar or diaries have reflect the amounts, amounts of the unauthorized withdrawals that you had made?

A. No.

Q. To your knowledge, did Mr. Ryu during your employment at Bank Asiana maintain a bank issued calendar or diary or appointment book?

A. That, I don't know, probably his secretary of state knows.

Q. Again, I'm not asking you to guess or speculate. To your knowledge, does Mr. Ryu have anything in writing which would reflect the total amount or the various amounts that -- of cash that you delivered to him from the unauthorized withdrawals that you made?

A. I don't know.

Q. Did you have any discussions during your employment at Bank Asiana, did you have any discussions with Mr. Ryu concerning a woman named Eun Hee Pak, E-U-N, H-E-E, P-A-K?

MR. YI: I believe it's --

A. She was just an employee. What is the

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M. CHON

question?

Q. My question is, did you have any discussions with Mr. Ryu concerning Ms. Pak?

A. I don't recall.

Q. During your employment at Bank Asiana, did you have any knowledge of the nature of the relationship between Mr. Ryu and Ms. Pak?

A. His secretary? I think he was doing that -- that kind of work.

Q. Beyond that, did you have any knowledge about the nature of the relationship between the two of them?

A. I understood as Eun Hee Pak's husband's -- business-wise somehow connected with James Ryu, James Ryu.

Q. During your employment at Bank Asiana, did you have any discussions with Mr. Ryu concerning a business that he owned, a hair salon business that he owned called Luz, or Luz, spelled L-U-Z?

A. I think that is connected to Eun Hee Pak.

Q. When you say that business was connected to Ms. Pak, can you just clarify what you mean?

A. Whether they are partners -- whether they -- it was sold from one to another. I think that's what I heard. That's how I heard.

Q. I'm sorry, let me just go back to my original

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M. CHON

question. During your employment at Bank Asiana, did you have any discussions with Mr. Ryu, any specific discussions with Mr. Ryu concerning his hair salon business called Luz?

A. No.

Q. During your employment at Bank Asiana, did you have any discussions with Mr. Ryu concerning a business that he owned called a cafe business called Seleste, S-E-L-E-S-T-E?

A. No.

Q. During your employment at Bank Asiana, did you have any discussions with Mr. Ryu concerning Soyu Architecture, S-O-Y-U?

A. No.

Q. Did you have any discussions with Mr. Ryu concerning an individual named Michael Kim?

A. Michael Kim was our customer, but we had a lot of -- many internal calls concerning his account.

Q. Do you recall any conversations with Mr. Ryu in which he told you that he owed monies to Soyu Architecture?

A. The question right now, are you asking me the conversation with Mr. Ryu?

Q. Yes, did Mr. Ryu ever tell you?

A. No.

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M. CHON

A. Kore Consulting and nail salon called Cleo, he's the president of the -- I'm sorry, what was the --

Q. I'm sorry, what was the name of the nail salon?

A. Cleo.

Q. C-L-E-O?

A. Yes.

Q. My question though was, do you recall having any discussions with Mr. Ryu during your employment at Bank Asiana about Kore Consulting?

A. About -- regarding the business we have not talked.

Q. At any time when you delivered sums of cash to Mr. Ryu or he picked them up, during that time period, did he ever tell you why he needed the money or wanted the money?

A. No, but I knew he had debt.

Q. Do you know who he owed monies to?

A. Michael Kim.

Q. Was it Michael Kim or was it companies or businesses owned by Michael Kim?

A. That, I don't know exactly.

Q. Did he ever tell you about the nature about the debt?

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M. CHON

Q. Did Mr. Ryu ever tell you that when he asked you for money that he -- or at any other time whether he owed monies to a person by the name of Michael Kim?

A. No.

Q. During your employment at Bank Asiana, did you have any discussions with Mr. Ryu concerning a bank called New Millennium Bank?

A. No.

MR. YI: Why don't we take a quick break.

THE VIDEOGRAPHER: Stand by. The time is 4:38. We're going off the record.

(Brief recess was taken.)

THE VIDEOGRAPHER: The time is 4:50. We're back on the record.

Q. Ms. Chon, during your employment at Bank Asiana, did you have any discussions with Mr. Ryu concerning a business call Kore Consulting, K-O-R-E.

A. In relations to the account, to an account.

Q. Was Michael Kim the president and shareholder of Kore Consulting?

A. Yes.

Q. So when you mentioned earlier that Michael Kim was a customer of Bank Asiana, were you referring to Kore Consulting?

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M. CHON

A. Michael Kim has told me.

Q. And was that during your employment at Bank Asiana?

A. Yes.

Q. Can you tell us what you remember him telling you?

A. Michael Kim had a lot of accounts for Cleo Nail Salon. The accounts were always overdrawn. It was always -- they were always negative balance. I mean, if the -- the checks, the banks would not pay for them unless they do deposits because there was not sufficient money always. Every time he'd call me, oh, to ask me to give one more day like a grace period and -- but I didn't have the authority for that and I had to get an approval from Mr. Ryu, but I'm supposed to get it from the branch manager.

But Michael Kim would ask me to call directly Mr. Ryu and so two -- those two people, they would talk on the telephone and then James Ryu would instruct me to pay, to pay and that was repeated several times. The same instant kept happening. I would tell Michael Kim I can't do it; he needs to make a deposit and he would say, oh, if James Ryu -- James Ryu would pay him the money then he could use that money to deposit, but I don't -- you know,

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M. CHON

he doesn't have the money. That's what he used to say.
That's how I found out.

Q. So is it your testimony that during those
conversations with Michael Kim, he told you that Mr. Ryu
owed him money?

A. Yes.

Q. Did he ever tell you how much Mr. Ryu owed to
Michael Kim?

A. No, he didn't say. He's never said the exact
amount.

Q. Did he ever tell you the nature -- withdrawn.

Did he ever tell you the -- why Mr. Ryu owed
monies to Michael Kim?

A. Everything I heard, like, from employees. I
heard from employees, all the employees they knew.

Q. When you say all the employees knew, what did
they know?

A. Oh, that, you know, they didn't know what kind
of business/which business but through business this debt
was accumulated, this detective arose.

Q. Is it your testimony that based on what you
heard from other employees from Bank Asiana that you had an
understanding that Mr. Ryu had debts relating to one or
more of his businesses?

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M. CHON

A. Yes.

Q. Did Michael Kim's company Cleo have -- at the
time you were employed by Bank Asiana have a loan with Bank
Asiana?

A. Yes.

Q. Do you remember the amount of the loan,
approximately?

A. It was a lot.

Q. Was it over a million dollars?

A. A lot more. Near five million. It was just
not one loan, one. Several, several loans.

Q. Did Michael Kim ever tell you that Mr. Ryu
owed him money because a portion of the loan proceeds taken
out by Cleo was given to Mr. Ryu?

A. No.

Q. Earlier today you told us that before --
sometime before you left the employee of Bank Asiana that
you had lunch with Mr. Ryu and Irene Lee, do you remember
that?

A. Yes.

Q. During your employment at Bank Asiana, did you
have any other lunches with just Mr. Ryu?

A. Just two of us?

Q. Yes.

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M. CHON

A. Almost it was always with Irene Lee. I don't
recall. Two of us.

Q. Do you recall the circumstances leading up to
that lunch?

A. When?

Q. It was sometime before you left Bank Asiana,
you told us that you had lunch with Mr. Ryu and Irene Lee,
how did the two of you come to have lunch together?

A. Always Irene Lee calls me. They always asked
me out unless I have another lunch appointment.

Q. At that lunch, did you have any private
discussions with Mr. Ryu outside of your lunch with Irene
Lee?

A. No.

Q. Ms. Chon, with respect to the unauthorized
withdrawals that you made while you were employed by Bank
Asiana, is there anything -- is there anything about those
withdrawals that you have not told us about today that you
have not covered?

A. Apart from this? No.

Q. So, to the best of your knowledge and to the
best of your recollection, we have covered today thus far
all the facts as you know them related to your unauthorized
withdrawals that you made while you were employed at Bank

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M. CHON

Asiana?

A. Yes.

Q. With respect to Mr. Ryu and the fact that he
asked you for money and the fact that you delivered sums of
cash to him at his request from the unauthorized
withdrawals, is there anything that we have not covered in
that respect?

A. No.

MR. YI: I have no more questions at this
time. Plaintiff Wilshire Bank reserves the right to
continue the deposition of this witness.

A. One thing, one thing.

Q. Okay.

A. To other employee, Irene Lee personal loan, I
understand that -- I know as he asked for a personal loan
from the CEO -- the CEO received a request, no, no. Irene
Lee, the CEO -- the Irene Lee received a request from the
CEO to take a personal loan and lend them money to James
Ryu.

Q. When you say CEO, are you referring to
Mr. Hong Sik Hur?

A. Yes.

Q. Who during your employment with Bank Asiana
was president and CEO of Bank Asiana?

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M. CHON

A. Yes.

Q. Is it your testimony that Mr. Hur approached Irene Lee and asked Irene to take a loan from the bank and to use the proceeds of that loan and give it to Mr. Ryu?

A. We didn't -- at Bank Asiana, you can get an employee -- employee loan up to \$25,000, but already James Ryu took out his own -- his personal loan but he needed more money, so the -- so the CEO proposed to -- said to Irene Lee, I am going to approve the loan, the personal loan so take -- take the personal loan under your name and give that money to James Ryu. And at the time Irene Lee discussed that with me and the manager. But I know as Irene Lee refused that, that she couldn't.

Q. Okay. When you say you had a discussion about the CEO's proposal or suggestion, who's the manager that you're referring to?

A. Bo Young Lee manager, I think, it was.

Q. Bo Young Lee?

A. Bo Young Lee.

Q. Did there come a time when you found out that Irene Lee had resigned from Wilshire Bank?

A. Yes, I know.

Q. Do you know why she resigned?

A. I think because of this instant. I think she

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M. CHON

probably had a lot of work like she was working overtime a lot and she had to just get involved in this matter a lot. So, I mean I'm just -- this is my thought, my thinking.

Q. Did she ever tell you whether there was any specific reason or reasons that she resigned?

A. No. We have not talked on the phone since then.

Q. Is there anything else that we have not covered?

A. No.

MR. YI: I have no more questions at this time. Plaintiff Wilshire Bank hereby reserves the right to continue the deposition of this witness, following production of the documents we have requested including those previously requested in Wilshire Bank's first production of documents and first sets of interrogatories each dated October 24, 2014. Thank you.

EXAMINATION BY

MR. HARVEY:

Q. I am now going to ask some questions. Ms. Chon, my name is Steve Harvey and I represent James Ryu.

Before you worked for Bank Asiana, you worked for a bank in New York called Liberty, right? True?

A. Yes.

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M. CHON

Q. And just you -- when you left Liberty Bank, you went immediately on to maternity leave; isn't that true?

A. Yes.

MR. YI: Objection to form.

Q. And before you left Liberty Bank to go on that maternity leave, you, in fact, made some unauthorized withdrawals at Liberty Bank; isn't that true?

MR. YI: Objection to form.

A. No.

Q. Were you ever -- to the best of your knowledge, were you ever suspected of making unauthorized withdrawals at Liberty Bank?

A. Yes.

Q. And who suspected you?

A. My supervisors/branch manager.

Q. And do you know why she suspected you?

A. Because there was a -- cash was short in the vault at the time.

Q. How much was cash short at the vault at the time?

A. \$10,000.

Q. And do you know why the cash was short in the vault?

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M. CHON

A. At the time they couldn't find it.

Q. Did you -- do you know why the cash was -- I'm asking you if you know why that cash was short in the vault?

A. I don't know.

Q. Did you take that \$10,000?

A. No.

Q. Did you -- on your last day of your employment, was your purse searched by an employee and \$4,000 was discovered in your purse?

MR. YI: Objection to form.

A. \$4,000?

Q. Yes.

A. No.

Q. Was any amount found in your purse on your final day?

A. I don't recall, but I was doing business at the time so I always had some cash.

Q. Large amount like several thousand dollars?

A. I mean, it was -- at the time it was probably after I made a deposit, but I don't always carry several thousand dollars.

Q. At the time though, at the time she left, did she have several thousand of dollars carrying -- Karen,

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M. CHON

excuse me, did you have several thousand of dollars in your purse on your last day at Liberty Bank?

A. I don't recall.

Q. When you met with Lisa Pai from Wilshire Bank, did she ask you about your experience at Liberty Bank and whether you had taken any money while you were at Liberty Bank?

A. I don't recall.

Q. Did anybody at any time after the -- this came to light, this embezzlement from Bank Asiana, did anyone either from Wilshire, or anyone else, or the United States Government, or anyone ask you about the -- about missing funds from while you were at Liberty Bank?

A. No.

Q. So no one ever asked you whether you had embezzled funds from Liberty Bank, true?

A. I have not embezzled.

Q. Did anyone -- I understand. Did anyone ever ask her about embezzling or unauthorized funds or any money that's been improperly taken while she was at Liberty Bank? Was she ever asked about that at any point of the investigation or investigations of the matters that we have been talking about today?

MR. HARVEY: Do you want me to rephrase?

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M. CHON

THE INTERPRETER: Yes, please. I'm not clear.

MR. HARVEY: I just want to be clear.

Q. In all the times since January 2014, when people had been asking about what happened with this money from Bank Asiana, did anybody ask at -- whether you had taken any money or done anything improper while at Liberty Bank?

A. No.

Q. You said that James Ryu -- I think you said that he discovered or caught that you had taken or made unauthorized withdrawals; is that your testimony?

A. Yes.

Q. And how did he catch you or discover it?

A. Because he told me.

Q. What did he say?

A. He first told me about the -- let me clarify. James Ryu told me first -- James Ryu said -- one moment, please -- told me about this friend's account and my sister-in-law's account, you know, to take the money out of the CD or instrument accounts. One moment, please.

When he first called me over, he told -- he said that to me that he knows that -- he knows everything about that I made such transactions. And he said, do you know this is wrong and he said that that's how I learned he

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M. CHON

found out.

Q. And did he say which transactions or which accounts that he was aware?

A. No, he didn't say names.

Q. And at the point where he caught you, you had only taken money from two accounts; that was the account you had told us earlier, the man named Paek and the woman named Kim?

A. Yes.

Q. How much money had you taken out - how much was the amount of the unauthorized withdrawals at the time he caught you, approximately?

A. I don't recall.

Q. What was the total amount that she took from -- Ms. Chon, what was the total amount that you took out from Ms. Kim's account?

A. I don't know. Not sure.

Q. How about the total amount you took out from Mr. Paek's account --

A. I don't know.

Q. When you took money out of the ca -- out of the vault, how did you actually physically bring the cash out of the vault without anybody seeing you?

A. I mean -- I mean I wasn't trying to hide it

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M. CHON

from anyone. You just take the -- carry, you just carry the cash out. All the employees saw it.

Q. And so when you took the cash out of the vault, you had to get it home with you somehow. So, did you put it in your purse or did you put it in your socks or how did you get the money, the cash out of the bank without people seeing you taking cash out of the bank?

A. I rarely took it home. It was always at the bank.

Q. So you kept -- you took the money out of the vault and then you kept it at your work station? Do I understand that correctly?

A. Yes.

Q. Where did you keep the money at your work station?

A. In the drawer.

Q. And then would you ever take some cash to pay the debts for your husband's business or is this your personal debt? Would she ever take the cash outside the bank?

A. No, you make a deposit. But the amount I gave to James Ryu was more so I kept it in order to give it to James Ryu.

Q. So, you took cash out and you put it in a

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M. CHON

drawer at your work station so that you could then send at least some of the money to James Ryu? Do I understand you correctly?

MR. YI: Objection to form.

A. Yes.

Q. And then on the occasions when he would come and get it, you would put some of the cash in an envelope and then hand it to him? Is that how it worked?

A. Yes.

Q. When you took money out of the vault, did you typically take ones, and fives, or tens, and twenties or was it hundreds or some? Or was the cash in the vault organized so you can take it out in denomination?

A. The vault is organized in denomination.

Q. Which denominations? Which did you take?

MR. YI: Objection to form.

A. Hundreds.

Q. Did you ever take out any bills larger than hundreds?

A. No.

Q. How do you know that the amount that you paid on your husband's debts and your personal debt was \$500,000 approximately if you didn't keep track of it?

A. We had a loan at -- with the -- with Bank

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M. CHON

Asiana so we were -- you know, I was paying off that loan. So it was the amount that I could tell without writing down.

Q. And what was the amount of that loan that was paid off?

A. I don't know.

Q. She said -- Karen, you said that you paid off some personal debt too, how much was that?

A. That was also a bank loan.

Q. Who was that bank loan with?

A. Bank Asiana.

Q. How much was that bank loan?

A. That was \$25,000.

Q. And so the remainder of \$475,000 that you took was used to pay debts of your husband's businesses which you paid directly at the bank, do I understand that correctly?

MR. YI: Objection to form.

A. No.

Q. How did she pay it then?

A. Which one?

Q. The loans for her husband's businesses.

A. You are asking me how I paid the bank debt, bank loan, right?

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M. CHON

Q. I'm asking how she spent all the money other than the \$25,000 that she used to pay her personal loan; how physically were those monies paid to those debts?

A. I make deposit and then pay it.

MR. YI: Okay. Can I just clarify one thing? I think -- I think you may have heard about one loan. I heard about more than one a lot with Bank Asiana. One personal loan for 25,000 and I believe she mentioned the loan to one or more of her husband's businesses. You may not have heard that.

MR. HARVEY: Thank you.

Can you read back the last answer please, court reporter?

(Record read as follows: "ANSWER: I make deposit and then pay it.")

Q. So you make deposits at Bank Asiana with that cash?

A. Yes.

Q. And so if we went to the records and we saw the amounts that were paid on the loans for your husband's businesses, we would know the total amount that you paid; is that correct?

A. I don't know if that money was all used for that. I'm not sure.

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M. CHON

Q. Well, did you ever take any of the money that you took of the unauthorized withdrawals and use it to spend on yourself, for example, to go away for the weekend or to go buy some clothing or gift or -- did you ever use the cash that you took out for any reasons other than to pay this personal loan or these other loans that you mentioned?

A. I've used it. I've spent it.

Q. And what kinds of things did you spend it on?

A. I think just for living. I used it.

Q. Did you use it to buy drugs?

A. No.

Q. Did you have any relationships, any friends that you would go out and spend money with?

A. No.

Q. When you said that you just used it to for living expenses, what are examples of living expenses that you used this money for?

A. Like rent for instance, pay for mortgage.

Q. Did your husband ever notice that hundreds of thousands of dollars of his debts were being paid?

MR. JEON: Objection as to form.

(Whereupon, the reporter requested clarification.)

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1 M. CHON
 2 THE REPORTER: What was the last part you
 3 said?
 4 MR. JEON: Objection to form.
 5 A. I have not paid off hundreds of thousands of
 6 dollars.
 7 Q. How much did you pay for your husband's and
 8 businesses debt?
 9 A. I don't know.
 10 Q. The -- do you understand that the restitution
 11 order that is in connection with your guilty plea requires
 12 you to pay back 1.4 million dollars?
 13 MR. YI: Objection to form.
 14 A. I don't understand the question.
 15 Q. The question is, do you understand that the
 16 government in connection with your guilty plea is requiring
 17 you to take out an obligation to pay back approximately 1.4
 18 million dollars?
 19 MR. YI: Approximately, I think, he said.
 20 A. Yes.
 21 Q. How do you know if you didn't keep track that
 22 the amount that you gave to James Ryu as you claim was
 23 approximately \$700,000?
 24 A. Because I knew who the CD accountholders were
 25 and you go into those accounts and you can see how much

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1 M. CHON
 2 minutes.
 3 MR. JEON: Okay. Thank you.
 4 Q. Were you friends with James Ryu?
 5 A. No.
 6 Q. Did you know him well?
 7 A. I know as my work superior, supervisor.
 8 Q. Did you ever have a meeting with him outside
 9 the office?
 10 A. No.
 11 MR. HARVEY: I think we can stop for now. I
 12 have further questions but this is a logical stopping
 13 point. We're going to hopefully be continuing this
 14 deposition as soon as we can schedule it in relation to the
 15 production of the documents. Thank you for your time
 16 today.
 17 THE VIDEOGRAPHER: Stand by. The time is now
 18 5:39. We are going off the record. This will end media
 19 unit No. 5 and the deposition for today.
 20 (Time noted: 5:39 p.m.)
 21
 22
 23
 24
 25

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1 M. CHON
 2 money was short. And I always knew in my mind how much it
 3 will be, you know how much you need to make up for that
 4 money so that's how I knew.
 5 Q. And what was the total amount that you needed
 6 to make up that money?
 7 A. That, I heard that was 1.4.
 8 Q. Not what she heard. Not what you heard,
 9 Karen. What you knew based on keeping track of the amounts
 10 that you were taking out of these customers' installment
 11 CDs?
 12 A. I knew it was around million dollars, one
 13 million.
 14 Q. And so of the million that you knew that you
 15 had to pay back to these customers you had taken out of
 16 their accounts, how did you know that the amount of that
 17 million, the amount that went to James as you say was
 18 700,000?
 19 MR. YI: Objection to form.
 20 A. I -- I mean, I -- I mean I had it in my head
 21 approximately that amount.
 22 MR. JEON: Excuse me. The garage closes at
 23 6:00. So, it's 5:00 --
 24 MR. YI: 5:38.
 25 MR. HARVEY: I'll wrap up. Just couple

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1 J U R A T
 2
 3 I, _____, do hereby certify under
 4 penalty of perjury that I have read the foregoing
 5 transcript of my deposition taken on _____;
 6 that I have made such corrections as appear noted
 7 herein in ink, initialed by me; that my testimony as
 8 contained herein, as corrected, is true and correct.
 9

10 DATED this ____ day of _____, 20____,
 11 at _____.

12
 13
 14
 15
 16
 17
 18 SIGNATURE OF WITNESS
 19
 20
 21
 22
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 24
 25

1 CERTIFICATE

2
3 STATE OF NEW JERSEY)
4) Ss.:
5 COUNTY OF HUDSON)
6

7 I, JENNIFER DE LEON, a Notary Public
8 within and for the State of New Jersey, do
9 hereby certify:

10 That MIYE CHON, the witness whose
11 deposition is hereinbefore set forth, was duly
12 sworn by me and that such deposition is a true
13 record of the testimony given by such witness.

14 I further certify that I am not
15 related to any of the parties to this action by
16 blood or marriage; and that I am in no way
17 interested in the outcome of this matter.

18 IN WITNESS WHEREOF, I have hereunto set
19 my hand this 7th day of July, 2016.
20
21

22 _____
23 JENNIFER DE LEON
24
25

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1 ERRATA SHEET FOR THE TRANSCRIPT OF:

2 Case Name: WILSHIRE BANK vs. MIYE CHON
3 Dep. Date: June 23, 2016
4 Deponent: MIYE CHON a/k/a KAREN CHON
5

6 CORRECTIONS:

7 Pg. Ln. Now Reads Should Read Reason
8
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15
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21 _____
22 Signature of Deponent

23 SUBSCRIBED AND SWORN BEFORE ME

24 THIS ___ DAY OF _____, 2016.
25

(Notary Public) MY COMMISSION EXPIRES: _____